

EXHIBIT 2

Lawyers' Committee Hours Worked in Common Cause/NY v. Brehm

<u>Timekeeper</u>	<u>Date</u>	<u>Hrs Worked</u>	<u>Hrs Billed</u>	<u>NOTES</u>
Powers	8/16/2016	3.3	3.3	Conduct legal research, review NY state law, work on legal memorandum recommending that LC open an investigation into whether the removal of inactive voters from the registration list accessible at polling places is an as-applied violation of Section 8 of the NVRA
Powers	8/17/2016	1.9	1.9	Continue work on investigation summary memorandum and circulate with P. Disney and R. Clouston and solicit feedback, confer with P. Disney re: thereto
Powers	8/19/2016	2.2	2.2	Complete draft of investigation summary memorandum and send to J. Greenbaum, E. Rosenberg, and M. Johnson-Blanco for review and approval
Powers	8/31/2016	2.2	2.2	Confer with R. Clouston, E. Rosenberg, P. Disney re: NY inactive voter investigation, type up summary and share with the team
Powers	9/21/2016	0.4	0.4	Confer with K. Clarke re: call with the NYSBOE yesterday, draft summary of events and send email proposing that we sent the NYSBOE a friendly letter re: inactive voters in about a week advising them of our position, confer with E. Rosenberg re: thereto (0.4)
Powers	9/26/2016	1.3	1.3	Begin drafting friendly letter to NYSBOE re: inactive voters, review summary of conversation, review NY state law and investigation approval memo to support letter (1.3)
Powers	9/28/2016	1.6	1.6	Continue drafting friendly letter to NYSBOE re: inactive voters, exchange emails with N. Thompson, R. Clouston, and K. Clarke re: NY election commissioners and other logistics, send draft of letter to R. Clouston for feedback (1.6)
Powers	9/30/2016	1.0	1.0	Edit, revise, and complete draft of friendly letter to NYSBOE re: inactive voters and send to E. Rosenberg, J. Greenbaum for review (0.8); exchange emails with E. Rosenberg and J. Greenbaum re: practices for processing inactive voters in other states (0.2)
Powers	10/25/2016	4.1	4.1	Conference call with D. Kolb and R. Clouston re: NY inactive voter issue and next steps (0.4), draft summary of conversation and send to K. Clark, J. Greenbaum, E. Rosenberg (0.6); review NY state law, results of our investigation into NY election practices, and NVRA and begin outlining and drafting NVRA notice letter (2.0); exchange emails with E. Rosenberg re: potential clients, conduct research into NY's client solicitation rules and circulate summary of research with E. Rosenberg and J. Greenbaum, exchange emails with E. Rosenberg re: thereto (1.1)
Powers	10/26/2016	3.4	3.4	Exchange emails with R. Clouston and S. Lerner re: setting up phone call, confer with S. Lerner re: inactive voter issue and CCNY being a signatory on an NVRA notice letter and send her a draft of the letter for her review (0.9); continue drafting NVRA notice letter and send draft to J. Greenbaum and E. Rosenberg, review edits from J. Greenbaum and make edits to NVRA notice letter and re-circulate (2.5)
Powers	10/27/2016	1.1	1.1	Continue editing and revising NVRA notice letter in light of feedback, complete draft and send to K. Clarke for review, exchange emails re: thereto (1.1)
Powers	11/2/2016	1.9	1.9	Edit, review, finalize NVRA notice letter, research service-related issues re: NVRA notice letters, handle logistics related to signatures/etc., and email/fax NVRA notice letter to the NYSBOE (1.3); exchange emails and call S. Lerner to discuss approval from national to send letter, other logistics relating to serving the letter (0.6)

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Powers	11/5/2016	0.7	0.7	Confer with E. Rosenberg re: NVRA notice letter, strategy going forward and next steps, and exchange emails re: thereto (0.7)
Powers	12/13/2016	0.5	0.5	Confer with S. Lerner re: NVRA notice letter update and discuss next steps (0.5);
Rosenberg	1/3/2017	0.4	0	Confer with J Powers re status; confer with WNYC reporter re thereto
Rosenberg	1/6/2017	1	0	Participate in call with co-plaintiffs in preparation for call with DOJ; participate in call with DOJ re intervention; confer with J Powers re status and next steps
Powers	1/25/2017	0.6	0.6	Confer with E. Rosenberg and R. Clouston regarding outreach to NY inactive voters, review LatinoJustice observation report letter summarizing voter experiences in 2016
Powers	1/26/2017	1.6	1.6	Draft memorandum describing NY inactive voter outreach project, identifying the criteria for the voters that we're looking for, potential questions to be considered when interviewing voters, and send to R. Clouston and E. Rosenberg by email (1.2); review NY AG complaint in intervention and identify admissions helpful to inactive voter matter, send by email to E. Rosenberg and C. Clouston (0.4)
Powers	1/27/2017	0.8	0.8	Exchange emails and confer with R. Clouston re: NY inactive voter outreach project, potential next steps, etc., set up phone call with S. Lerner re: voter outreach project
Powers	1/30/2017	4.2	4.2	Confer with E. Rosenberg re: ramifications of the NY AG's intervention in the NYC voter purge matter into our ongoing investigation into the inactive voter issue (0.3); draft legal memorandum analyzing amount of factual overlap between the cases, the relevant applicable rules of the NY and DC rules of professional responsibility re: confidentiality of information, conflict of interest, communications with represented parties, and the legal standard for attorney disqualification in the Second Circuit, and discuss the memo with E. Rosenberg (3.9)
Powers	1/31/2017	1.4	1.4	Edit, review, and finalize legal memo re: NY and DC professional rules, send to E. Rosenberg by email, and confer re: thereto (0.8); phone call with S. Lerner and R. Clouston re: NY inactive voter outreach project, confer with R. Clouston after call (0.6)
Powers	2/7/2017	1.6	1.6	Discuss legislative history of statute with E. Rosenberg (0.3), review and download various sections of NY election law, undertake review of legislative history of NY Elec. Law 5-712 and 5-213 (1.0), discuss research and next steps and exchange emails with N. Karasov (0.3)
Powers	2/8/2017	0.9	0.0	Phone conversation with S. Lerner to discuss the case, potential for legislative reform, appropriate strategy, and next steps (0.5), confer with N. Karasov re: legislative history research (0.4) (NC)
Powers	2/14/2017	0.3	0.3	Exchange emails and confer with N. Karasov re: NY Elec. Law legislative research
Powers	2/22/2017	1.0	0.0	Discussion with S. Lerner, K. Clarke re: drafting a letter to Gov. Cuomo to pursue legislative reform (0.2); review legislation pending in the legislature, begin drafting letter (0.7) (NC)
Powers	2/23/2017	1.3	0.0	Continue drafting letter to Gov. Cuomo re: legislative reform in the current legislative session, revise, edit, complete draft and send to K. Clarke (NC)
Powers	2/28/2017	1.3	0.0	Confer on the phone with S. Lerner (0.3), edit and review draft of letter to make changes and add NY voter turnout rates and other substance (0.5), draft cover email for K. Clarke to send along with letter, and send to K. Clarke (0.3) (NC)
Powers	3/8/2017	0.8	0.8	Speak with L. Wolfe on the phone and begin drafting declaration
Powers	3/15/2017	0.5	0.0	Confer with U. Lalovic regarding the status of the NY inactive voter outreach project, go through potential declarants one by one, discuss relevant and important criteria, next steps, etc. (NC)

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Powers	3/19/2017	1.1	1.1	Continue drafting, review, edit Wolfe declaration, make notations for future follow up
Powers	4/6/2017	0.6	0.0	Confer with U. Lalovic regarding NY inactive voter outreach project and guidance re: potential content of declarations, issues with some potential voters (NC)
Powers	4/7/2017	1.9	0.0	Discuss e-poll book legislation with S. Lerner (0.4); research NY S.B. 2788, and prepare memo containing mootness analysis for any potential claim in the event the statute is enacted (1.5) (NC)
Powers	4/12/2017	0.2	0.0	Exchange emails with U. Lalovic re: content of declarations to voters contacted through the inactive voter outreach project (NC)
Powers	4/12/2017	0.3	0.0	Confer with U. Lalovic to get update on NY voter outreach project and declarations (NC)
Powers	5/16/2017	0.8	0.8	Speak with Lauren Wolfe to ask further questions regarding her experiences attempting to vote in the November 2016 election; conduct research into NYS state law relating to what election officials were required to do with respecting to her situation
Powers	5/17/2017	1.0	1.0	Conducted legal research into relevant New York state law relating to affidavit ballots
Powers	5/18/2017	2.0	2.0	Draft FOIL request to send to counties seeking information about affidavit ballots, and circulate it to Ezra and Jon by email
Powers	6/9/2017	0.9	0.9	Research status of SB 2788 and AB 5547 re: electronic poll books, discuss with S. Lerner, talk with Z. Morrison and ask him to continue following the bill and checking for updates, discuss research topics for litigation approval memo
Powers	6/13/2017	1.2	1.2	Conversation with E. Rosenberg about the case; reviewed Matika declaration; sent email to Ursula Lalovic re: Matika declaration and confidentiality agreement; reviewed confidentiality agreement and shared with Ezra; found cases and prior research that might be relevant to the NY inactive voter approval memo, which I shared with Z. Morrison
Powers	6/14/2017	2.2	2.2	Conduct legal research, begin draft outline for, and begin drafting litigation approval memo sections re: introduction and general NVRA standard (1.3); continue research of mootness under state and federal law for insert into approval memo (0.4); exchange emails with U. Lalovic (0.2); meet with Z. Morrison to discuss few questions re: individual standing (0.3)
Powers	6/22/2017	1.1	1.1	Exchange emails with U. Lalovic re: M. Wilson declaration (0.3); meet with Z. Morrison to discuss legal research on individual standing (0.3); confer with S. Lerner and Z. Morrison re: status of inactive voter/ poll book matter, obtaining approval for litigation, and need for CCNY to obtain draft of approval memo (0.5)
Powers	6/24/2017	3.8	3.8	Review DOJ as-applied NVRA case involving the St. Louis Board of Elections, NC case re: undeliverable mail, Project Vote v. Blackwell, other NVRA cases; draft NVRA legal analysis portion of the litigation approval memo (3.8)
Powers	6/26/2017	4.9	4.9	Review Crawford, Anderson, Burdick, other right to vote cases cases; draft burden on the fundamental right to vote claim portion of the litigation approval memo (4.2); exchange emails with U. Lalovic re: declarants' information and issue of personally identifiable information in declarations (0.4); discuss fundamental right to vote claim with Z. Morrison (0.3)
Powers	6/28/2017	2.8	2.8	Review voter declarations, election inspector manuals, investigation approval memorandum, and work on drafting the fact section of the approval memo
Powers	6/29/2017	2.7	2.7	Westlaw research for relevant case law, add citations and footnotes, conduct grammar review and cite check on the approval memo (2.3); confer with S. Lerner re: status of matter and next steps (0.4)

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Powers	7/1/2017	3.4	3.4	Review, edit approval memo, incorporate research and citations received from Z. Morrison
Powers	7/6/2017	4.5	4.5	Put together exhibits for approval memo (0.5), complete and finalize first draft of approval memo and email to E. Rosenberg for review (3.2); prepare redacted version of approval memo that can be shared with S. Lerner (0.7)
Powers	7/10/2017	1.9	1.9	Review and edit approval memo in light of feedback from E. Rosenberg and circulate version of approval memo to J. Greenbaum for his review
Powers	7/11/2017	3.2	3.2	Exchange multiple emails with J. Greenbaum regarding viability of fundamental right to vote claim, timing of relief, the nature of the violation and the relief request, and confer with E. Rosenberg re: J. Greenbaum's feedback, send to K. Clarke for her review (0.9); review and amend approval memo in light of feedback from J. Greenbaum (2.1)
Powers	7/12/2017	3.5	3.5	Send redacted version of approval memo to S. Lerner, and confer with S. Lerner re: thereto (0.8); exchange emails and provide feedback to U. Lalovic re: M. Wilson declaration (0.4); respond by email to K. Clarke's feedback re: substance of approval memo and 50-state research and potential co-counsel and related issues (0.8); discuss case and co-counsel issues with K. Clarke and E. Rosenberg (0.4); prepare firm solicitation summary and send to N. Anderson, and exchange emails with Nancy re: thereto (1.1);
Powers	7/13/2017	0.3	0.0	Exchange emails with U. Lalovic re: M. Wilson's declaration and exchange emails with N. Anderson and E. Rosenberg re: firm solicitation/co-counsel issues
Powers	7/17/2017	0.6	0.0	Conversations with Nancy Anderson, Ezra, and Kristen regarding the pro bono firm selection process and relevant criteria (e.g., when do we want to file, what type of firm experience, etc.); reviewed and sent emails involving Nancy and Ezra re: the same (NC)
Powers	7/19/2017	1.2	1.2	Emails to and from Neil Steiner coordinating a phone call for tomorrow; placed approval memo and exhibits in a Dropbox folder and shared them with Dechert co-counsel; emails with May Chiang regarding her unavailability to participate in the case
Powers	7/20/2017	0.8	0.4	Call with Ezra and Neil Steiner about the prospect of Dechert serving as co-counsel in this potential litigation (0.4 - NC); reviewed documents and prepared for the phone call (0.4)
Rosenberg	7/26/2017	1	0	Review approval memo; confer with J Powers; confer with J Perez; confer with NSteiner, all in relation to next steps
Powers	7/26/2017	0.3	0.0	Confer with E. Rosenberg regarding potential co-counsel (NC)
Rosenberg	8/1/2017	0.5	0	Review and comment on co-counsel and retainer agreements; emails to and from J Perez, J Powers and N Steiner re thereto
Powers	8/1/2017	2.9	2.9	Prepared a draft-co-counsel agreement; prepared a draft retainer agreement with Common Cause NY and circulated them with Neil Steiner, Jose Perez, and E. Rosenberg; talked with Ezra about both the co-counsel agreement and draft retainer agreement; spoke with Susan Lerner on the phone about the new case; sent Susan Lerner the draft retainer agreement
Powers	8/2/2017	1.2	1.2	Reviewed draft retainer agreement for Common Cause NY; made edits and sent to Susan Lerner
Powers	8/4/2017	1.0	1.0	Sent emails to Neil and Jose Perez regarding setting up a conference call; sent email to Tharuni, Anna, and Hilary attaching approval memo and introducing myself to them; added co-counsel to Dropbox folder including approval memo and exhibits so they could review materials

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Powers	8/7/2017	1.6	1.6	Reviewed email prepared by Tharuni on the Section 8 issues raised by our potential litigation, as well as her analysis of the True the Vote case; reviewed Neil Steiner's emails raising questions of venue and sovereign immunity; sent lengthy email back to Neil discussing our view of whether the State of New York could be sued; re-reviewed our GA registration runoff brief's discussion of the NVRA sovereign immunity issue, and reviewed Judge Batten's order to see if he addressed the issue at all
Rosenberg	8/8/2017	1	0	Participate in conference call with co-counsel; review and execute co-counsel agreement; confer with J Powers re next steps
Powers	8/8/2017	1.4	1.4	Preparation for and participation in phone conference discussing the New York NVRA matter with co-counsel; emails to and from Neil regarding discussion of venue; emails to and from co-counsel scheduling the conference call; sent email circulating Susan Lerner signature page; confer with E. Rosenberg regarding litigation and next steps
Powers	8/9/2017	2.2	1.2	Drafted press release for the NY NVRA matter; circulated draft press release with Ezra, Derrick Robinson, and others; email co-counsel to get quotes from their principals for the press release, multiple emails to and from Alexis Grenell, John Garcia, regarding the press release (1.0 - NC); emailed Ezra R. regarding obtaining authorization forms from voters to obtain personal voter registration information from voters from whom we obtained declarations, emails discussing strategy and claims related to filing (1.2)
Powers	8/10/2017	0.4	0.0	Reviewed email from Alexis Grenell re: press release - quote from Susan Lerner; forwarded her email to Derrick Robinson with a note about the status of the press release (NC)
Powers	8/17/2017	3.6	3.6	Reviewed draft complaint and drafted lengthy memo with several comments on substantive questions and issues re: claims, facts, etc. raised in Neil Steiner's email circulating the draft complaint (3.2); found declarations for Susan Lerner prepared from past litigation, reviewed, and included those in my email response to Neil re: standing issue (0.4)
Powers	8/19/2017	2.0	2.0	Reviewed draft complaint; prepared redline with detailed proposed edits and comments; circulated my suggested revisions with Neil, Tharuni, and Ezra by email
Powers	8/23/2017	1.5	1.5	Reviewed draft complaint prepared by the Dechert team; redlined draft and made comments; circulated those with opposing counsel by email
Rosenberg	8/24/2017	0.5	0	Review and comment on draft complaint; emails to and from J Greenbaum and J Powers re thereto
Powers	8/24/2017	1.0	1.0	Emails to and from Ezra regarding the draft complaint, making necessary edits, and the next steps in terms of getting internal approval to proceed; emails to and from Joanna and other co-counsel regarding setting up a conference call the following day
Powers	8/25/2017	2.0	2.0	Phone conference with Neil Steiner, Joanna Cuevas Ingram, and others regarding the decision to proceed with litigation in this case, making and circulating revisions to the complaints, the proper filing date and relevant practical considerations, etc.; draft lengthy email to Jessica Brady, Jon G., Ezra, Derrick Robinson, etc., explaining the decisions of the litigation team and proposing next steps for getting the litigation off the ground; email to Susan Lerner regarding making changes to the complaint and providing data re: the income-based registration gap
Rosenberg	8/28/2017	0.3	0	Review edits to draft complaint

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Powers	8/28/2017	1.6	1.3	Emails to and from co-counsel regarding the proper filing date for the lawsuit, draft lengthy email summarizing the new lawsuit and explaining how it fits in with the old lawsuit we filed against the New York City Board of Elections in November (1.3); conversation with Jessica Brady and emails regarding lining up an exclusive and the proper press strategy (0.3 - NC)
Powers	8/29/2017	3.2	3.2	Reviewed most recent version of the complaint; made edits, most significantly to the paragraphs regarding racial and income-based impact; sent revised version of the complaint to Jon G. for review; emails between co-counsel regarding strategy, filing date, etc.; reviewed Joanna Cuevas Ingram's proposed edits to the draft complaint and responded by email; emailed Susan Lerner and spoke with her regarding data related to the paragraph in the complaint on the income-based registration gap
Powers	8/30/2017	1.0	0.0	Reviewed Jessica Brady's edits to the press release; redlined her version and circulated that with Jessica and Derrick Robinson (NC)
Powers	8/31/2017	3.8	1.9	Multiple emails to and from co-counsel regarding the press strategy, filing date, press release, talked with Jessica Brady about the press release; emailed revised release to Jon G Ezra R and Kristen for their review, reviewed and revised the press release (1.9 - NC) circulating the retainer agreement with Common Cause/NY, continued review of complaint in consideration of proper Defendants and claim, circulate a copy of the complaint (1.9)
Powers	9/1/2017	0.5	0.0	Confer with R. Clouston and exchange emails with R. Clouston and E. McGrath re: 50 state analysis of states' procedures for processing inactive voters (NC)
Powers	9/5/2017	6.5	4.6	Many emails between me, co-counsel, and Derrick Robinson regarding the press call tomorrow, the press release; the timing of filing the complaint, the press advisory, called Susan Lerner and exchanged emails regarding the press release (1.9 - NC) and organizing the filing; reviewed a second draft of the complaint circulated by the Dechert team in detail; redlined the complaint and circulated that with the team along with a lengthy email summarizing the most significant substantive changes; reviewed an earlier draft of the complaint and suggested substantive changes; phone call with Neil to discuss the filing (4.6)
Powers	9/6/2017	6.0	0.0	Emails to and from co-counsel regarding the press call; drafted memo to Kristen providing an outline of what to discuss on the press call; participated in the press call with co-counsel and reporters; call with Susan Lerner from Common Cause NY re: the same, reviewed the press release for accuracy and sent an email requesting an edit to Derrick Robinson and Jessica Brady; phone call emails to and from Derrick Robinson re: run of show (3.8); phone call with Neil Steiner regarding the pending filing of the complaint; conversation with Jessica Brady re: the same; emails to and from co-counsel asking for updates regarding the filing of the complaint; call with Kristen Clarke regarding the filing of the complaint; emailing the complaint to interested parties (2.2) (NC)
Powers	9/7/2017	2.4	1.4	Drafted description of the cause of action for the LC website, reviewed, finalized, and circulated with Ezra and Jon for review, reviewed articles discussing the filing of the lawsuit and circulated them with co-counsel (1 - NC); logged onto PACER to review pleadings; emails to and from co-counsel discussing completing service and discussing strategy; research into relevant precedent (1.4)
Powers	9/10/2017	1.2	0.0	Drafted summary of the NY NVRA litigation for use on the LC website and in other materials, circulated with the DerWayne Henry, Derrick Robinson, and Jessica Brady (NC)

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Powers	9/11/2017	1.3	1.3	Reviewed Judge Nathan's notice of initial pretrial conference; emails to and from co-counsel re: the same and pro hac vice application-related issues; emailed the notice of initial pretrial conference and Judge Nathan's standing order to co-counsel at the NY OAG's office
Powers	9/15/2017	1.0	1.0	Prepared requests for certificate of good standing for DC bar for me and Ezra Rosenberg; met with intern Delvin Hodges and gave him money, directions, and necessary documents to obtain certificates from the DC Court of Appeals' clerk's office; reviewed pro hac requirements in SDNY; emailed Tharuni from Dechert about preparing necessary documents to file pro hac applications
Powers	9/18/2017	2.2	1.1	Draft pro hac motion, affidavit, and proposed order in support of the pro hac motion, and circulated it with co-counsel (half charge)
Powers	9/20/2017	0.5	0.5	Conversation with Ursula Lalovic regarding voters affected in the November 2016 election and reaching out to them for declarations; went over Election Protection tickets and discussed specific
Powers	9/22/2017	1.6	0.8	Notarize affidavit for pro hac motion, review and finalize documents, exchange emails with H. Bonaccorsi and T. Jayaraman re: getting pro hac on file, service issues, and other issues related to filing the pro hac (half charge)
Powers	10/3/2017	1.2	0.6	Obtain information and assist with preparation of documents for E. Rosenberg's pro hac application, and exchange emails with E. Rosenberg and T. Jayaraman re: thereto (half charge)
Powers	10/4/2017	0.9	0.9	Exchange emails with T. Jayaraman re: motion to extend response deadline, preferred briefing schedule, confer and exchange emails with E. Rosenberg re: thereto
Powers	11/7/2017	2.3	2.3	Exchange emails and confer with A. Eriksson re: NYC voters who attempted to vote in the 11/7/17 election and reported that their name could not be found in the rolls when they appeared to vote, called and spoke with voters who reported the same
Powers	11/13/2017	1.5	1.5	Called and spoke with voters who reported they attempted to vote in the 11/7/17 election and reported that their name could not be found in the rolls when they appeared to vote
Powers	11/17/2017	0.9	0.9	Review motion to dismiss and begin identifying issues and gaps
Rosenberg	11/22/2017	0.4	0	Call with co-counsel re next steps
Powers	11/22/2017	2.3	2.3	Review motion to dismiss, review NVRA legal history, case law research, confer with E. Rosenberg re: issues to focus on (1.9); call with E. Rosenberg, N. Steiner and co-counsel re: next steps (0.4)
Weiss	12/4/2017	3	0	Background research on legislative history of National Voter Registration Act for response to Motion to Dismiss
Powers	12/4/2017	0.3	0.3	Confer with S. Weiss re: opposition to dismiss and attendant research
Weiss	12/5/2017	1.5	0	1.5: Further case law and legislative history research for response to motion to dismiss
Weiss	12/13/2017	4	0	4.0: Further research into case on the removal provision of the NVRA
Powers	12/13/2017	3.4	3.4	Exchange multiple emails with A. Do and S. Weiss re: outline of opposition to Ds' motion to dismiss and scheduling a call to discuss substance and assignments (0.3); conduct research on Westlaw and DOJ website into past as-applied Section 8 NVRA claims, other cases applying Section 8(d) and draft paragraphs (1.4); review outline and begin preparing extensive comments/memo, conduct attendant research into standing in the Second Circuit and other voting cases re: organizational standing (1.7)
Weiss	12/14/2017	4.5	0	0.5: Call with Dechert on outline for response to Motion to Dismiss 4.0: Drafting of section of response on de facto removal.

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Powers	12/14/2017	2.2	2.2	Call with co-counsel to discuss motion to dismiss (0.4); continue research into standing related issues, finalize my comments on draft outline and circulate with co-counsel by cover email (1.8)
Powers	12/17/2017	6.2	6.2	Draft de facto NVRA claim portion of opposition to motion to dismiss, research into draft portion of opposition brief addressing the legislative history of the NVRA,
Weiss	12/18/2017	4.1	0	3.4: Drafting and editing section on de facto removal for response to motion to dismiss.
Powers	12/18/2017	7.1	7.1	Exchange multiple emails with A. Do and other co-counsel re: order re: purported failure to prosecute (0.3); draft associational standing/risk of future harm portion of opposition to motion to dismiss, continue legal research in support of thereto (5.4); edit, review, complete both the standing section and the de facto NVRA section and circulate with co-counsel by email (1.4)
Rosenberg	12/20/2017	1.5	0	Review and revise brief in opposition to motion to dismiss; confer with J Powers re thereto; emails to and from J Powers re thereto
Weiss	12/20/2017	4.2	0	2.1: Create table matching up our response arguments and evidence to Defendants' Motion to dismiss. 2.2: Review and edit draft of response to motion to dismiss.
Powers	12/20/2017	5.4	5.4	Work on brief in opposition to motion to dismiss, revise intro, amend NVRA section, conduct additional case law research on Section 8 NVRA cases (4.6); review and comment on table showing Ds' MTD arguments and gaps in briefing (0.3); confer extensively with E. Rosenberg and S. Weiss re: brief in opposition to dismiss and exchange emails with E. Rosenberg re: brief (0.3); exchange multiple emails with N. Steiner, H. Bonaccorsi, A. Do re: thereto (0.2)
Rosenberg	12/21/2017	2	0	Confer at length with John Powers, Sam and Stacy re briefing issues; confer at length with Dechert team re thereto
Weiss	12/21/2017	4.9	0	0.4: Call with co-counsel at Dechert to discuss response to motion to dismiss. 4.5: Drafting and editing of response to motion to dismiss.
Powers	12/21/2017	6.9	6.9	Work on brief in opposition to motion to dismiss by closely reviewing sections on facial Section 8 violation and organizational standing, conduct extensive legal research related to both issues, identify relevant cases, draft portions of brief, reorganize portions of the brief, edit, revise, merge edits from S. Eriksson and S. Weiss, and circulate with team by email (5.1); confer at length with E. Rosenberg, S. Eriksson, and S. Weiss re: briefing issues related to the opposition to the motion to dismiss and confer at length with Dechert team regarding the same (1.8)
Rosenberg	12/22/2017	2	0	Further review of revised brief; call with Dechert team and J Powers re thereto; review of final draft; emails to Dechert team re thereto
Weiss	12/22/2017	4.1	0	0.6: Call with co-counsel at Dechert to discuss draft of motion to dismiss. 3.5: Edited response to motion to dismiss.
Powers	12/22/2017	5.8	5.8	Review and edit brief in opposition to the motion to dismiss, extensive research into Common Cause of Colorado v. Buescher case to determine validity of citation, research Hosemann decision, email team re: thereto, undertake final review and fact/ cite check of full brief; call with Dechert team and E. Rosenberg re: thereto (5); review final draft; exchange emails with Dechert team and with S. Weiss and E. Rosenberg re: thereto (0.5), review final draft of brief following found of edits by Dechert team and send emails re: thereto (0.3)
Powers	1/14/2018	0.6	0.6	Review Ds' reply brief and take notes re: thoughts and reactions, email E. Rosenberg re: thereto

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Powers	2/22/2018	0.4	0.4	Speak with S. Lerner and provide update on the case, next steps, send follow-up email to LC co-counsel re: thereto
Powers	4/16/2018	1.6	1.6	Conversation with Ezra about the status of the case; review pleadings to determine if there are any action items; email exchange with Neil Steiner and Ezra Rosenberg regarding whether taking any further action is appropriate at this time; review NVRA cases over the last three months to see if there is any supplemental authority that may be relevant to the court's consideration of the motion to dismiss
Powers	5/21/2018	2.1	2.1	Conduct Westlaw research to investigate whether or not there's any supplemental authority that would be on point; find two examples and circulate by email, along with a lengthy explanation as to the merits; email exchange with Neil Steiner and E. Rosenberg as to the validity of a supplemental
Powers	6/13/2018	0.9	0.9	Exchange emails with E. Rosenberg and N. Steiner re: obtaining relief for the 2018 election and potential strategy options (0.3); read SCOTUS Husted decision (0.6)
Powers	6/19/2018	3.7	3.7	Review court order and exchange emails with N. Steiner, E. Rosenberg, co-counsel re: same (0.3); confer with E. Rosenberg re: thereto (0.2); email S. Lerner to update her on case and confer with her re: thereto (0.3); review Husted to consider question of Husted's relevance to this case, closely focusing on language applicable to this case, conduct research into Husted's procedural history, read lower court opinions, conduct other research, review MTD in this case and our brief, taking notes, drafting preliminary outline (2.9)
Powers	6/20/2018	2.1	2.1	Conduct NVRA legal research, identify cases, and prepare brief outline analyzing facial and as-applied claims in light of Husted, locate, closely review, and send emails re: amicus brief filed by the NY AG in the Husted case
Weiss	6/21/2018	7.5	0	Written analysis of effect of Husted SCOTUS case on motion to dismiss briefing, if any
Powers	6/22/2018	1.8	1.8	Draft supplemental brief, conduct legal research and identify issues re: thereto
Powers	6/27/2018	2.8	2.8	Draft supplemental brief re: Husted, email A. Do and M. Manset re: thereto
Powers	6/28/2018	4.9	4.9	Draft supplemental brief re: Husted, review, edit, complete draft and circulate with the team by email
Rosenberg	7/2/2018	0.8	0	Review and comment on draft submission on Husted; review emails from J Powers and N Steiner re thereto
Powers	7/2/2018	3.2	3.2	Review, edit, continue working on draft of supplemental brief in opposition to motion to dismiss in light of feedback given (2.2); exchange numerous emails with J. Perez, E. Rosenberg and N. Steiner regarding brief (0.4); prepare research responding to NY argument re: FEC guidance and circulate with team (0.6)
Powers	7/3/2018	4.1	4.1	Continue editing and revising supplemental brief, working in FEC guidance issue, implementing N. Steiner's changes, other changes to shorten brief, conduct cite check, finalize, circulate with team (3.1); exchange numerous emails with N. Steiner, E. Rosenberg, J. Perez, etc. re: thereto (0.4); exchange emails updating S. Lerner re: thereto (0.2); review Ds' supplemental brief re: Husted and confer with co-counsel re: thereto (0.4)
Powers	7/5/2018	0.5	0.5	Exchange emails with S. Lerner re: Ms. Tesoriero's allegations re: problems with Ulster County poll workers not offering affidavit ballots to voters whose names are not listed in the poll book and review materials

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Powers	7/6/2018	0.4	0.4	Review materials re: Ulster County poll workers not offering affidavit ballots to voters
Powers	7/9/2018	1.1	1.1	Conversation with S. Lerner re: problems with Ulster County poll workers not offering affidavit ballots to voters whose names are not listed in the poll book and plan follow up; review materials, draft email circulating materials with co-counsel making recommendations as to future follow up
Powers	8/22/2018	0.5	0.5	Confer with N. Steiner, co-counsel re: case and statement from Mayor DeBlasio re: inactive voters
Powers	8/28/2018	2.1	2.1	Draft notice advising court of supplemental events (1.8); research and complete change of address notice (0.3)
Powers	8/29/2018	0.8	0.8	Complete draft of notice and circulate it with co-counsel for review
Powers	8/30/2018	1.6	1.6	Review and edit notice of supplemental events in light of feedback given, review applicable rules, exchange emails with N. Steiner, E. Rosenberg re: merits of filing notice
Snow	9/25/2018	1	1	Contacted and interviewed voters affected during Sept 13 primary election; compiled spreadsheet.
Powers	9/25/2018	0.8	0.8	Exchange emails and confer with S. Lerner re: potential voter witnesses, review spreadsheet with voter contact and descriptions
Snow	9/26/2018	0.5	0.5	Contacted and interviewed voters affected during Sept 13 primary election; compiled spreadsheet.
Snow	9/27/2018	1	1	Contacted and interviewed voters affected during Sept 13 primary election; compiled spreadsheet.
Snow	10/1/2018	5.9	5.9	Read court order (1); Voter declarations for Copps, Ferro Hart, Baldus (4.9)
Rosenberg	10/1/2018	1.4	0	Review decision on motion to dismiss; emails to and from K Clarke, J Greenbaum, J Powers, N Steiner re next steps
Powers	10/1/2018	4.9	3.5	Review decision on motion to dismiss; draft brief memo summarizing holdings; exchange emails and confer with S. Lerner re: thereto; emails to and from J. Greenbaum, E. Rosenberg, N. Steiner re: next steps including merits of PI motion (2); review and provide feedback on draft declaration for NYC voters S. Copps and Molly Ferro Hart (1.5); draft, review, edit press release and exchange emails with D. Robinson, B. Stern, C. Perez et. al re: thereto (1.4)
Snow	10/2/2018	5.2	5.2	Voter declarations for Stewart, Copps
Rosenberg	10/2/2018	0.2	0	Review notice of status conference; calendar same; confer with J Powers re thereto
Powers	10/2/2018	2.1	2.1	Review notice of status conference, review local rules, case management order, pretrial conference, work on potential fact issues (1.2); review draft declaration of Walter Ancarrow and provide feedback, confer with R. Snow re: thereto (0.7); confer with E. Rosenberg re: thereto (0.2)
Snow	10/3/2018	1.5	1.5	Voter declaration for Stewart
Powers	10/3/2018	2.8	2.8	Review declarations of Sheila Vinsont and Tina Jefferson (1.5), exchange multiple emails and confer with R. Snow and J. Conarck re: thereto; review Baldus declaration and provide feedback (0.5); review Stewart declaration and provide feedback (0.6); confer with S. Lerner and update her re; voter outreach (0.2)
Snow	10/4/2018	4.1	4.1	Voter declarations, cleanup
Powers	10/4/2018	1.2	1.2	Review declaration of Keoma Blake and provide feedback (0.5); review declaration of Susan Stewart a second time and finalize (0.4); review W. Ancarrow declaration a second time and finalize (0.3)

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Powers	10/5/2018	1.8	1.8	Review declaration of Baldus a second time and finalize, confer with R. Snow re; thereto (0.5); confer with S. Lerner re: case, text message campaign, and provide update re: CCNY's voter outreach, email co-counsel re: thereto (0.6), factual investigation re: NY voters Ferro Hart and Enslow (0.7)
Powers	10/9/2018	0.3	0.3	Exchange emails with N. Steiner re: ruling on motion to dismiss
Powers	10/12/2018	1.0	1.0	Exchange emails with J. Conarck re: voter witness G. Montas, and review Montas voter records; review voter declaration of L. Fritz and provide feedback
Powers	10/17/2018	0.7	0.7	Email exchange with J. Conarck re: L. Fritz, R. Snow re: Ferro Hart and other affected voters (0.4), review signed declarations fro Baldus and Blake and circulate with co-counsel by email (0.3)
Powers	10/18/2018	0.8	0.8	Confer and exchange emails with R. Snow re: voter N. Luna (0.4), exchange emails with N. Steiner and confer with co-counsel re: call with opposing counsel (0.4)
Powers	10/19/2018	1.1	1.1	Exchange emails and confer with S. Lerner re: voter not on the rolls and potential follow up, call voter (0.7); review draft case management plan and draft cover letter to Judge Nathan and offer feedback (0.4)
Powers	10/24/2018	1.6	1.6	Conference call with opposing counsel, co-counsel, exchange emails with co-counsel, review letter (0.5); emails re: scheduling conference for 11/2 (0.2); review revised draft of Sheila Vinson declaration and provide feedback (0.6); confer with S. Lerner providing update on status of case (0.3)
Powers	11/14/2018	0.9	0.9	Research fundamental right to vote claims
Powers	11/16/2018	3.1	3.1	Conversations with Neil Steiner and Ezra Rosenberg regarding the idea of amending the complaint to add a burden on the fundamental right to vote claim (0.4); conduct case law research into fundamental right to vote claims, compile opinions and pleadings, and draft brief memo and circulate with co-counsel (2.3); confer with S. Lerner and exchange emails with co-counsel re: amending complaint and related issues (0.4)
Powers	11/20/2018	2.4	2.4	Preparation and participation in phone call with Ezra and Dechert co-counsel regarding planning, strategy, and implementation with respect to discovery and amending our complaint; preparation and participation in second phone call with co-counsel and Susan Lerner from CCNY regarding the same (1.2); review, compile voter declarations, summarize contents, and share with team by email (0.3); brainstorm re: discovery requests (0.9)
Powers	11/21/2018	1.8	1.8	Draft brief memo re: discovery on NY AG's office, exchange emails with E. Rosenberg re: thereto, conduct research into subpoenas and draft list of potentially relevant docs in possession of NY AG
Snow	11/28/2018	1.6	1.6	Voter calls; Agro-Paulson Declaration
Snow	11/29/2018	1.2	1.2	Voter calls; Agro-Paulson Declaration; RFP/ROG brainstorm
Powers	11/29/2018	5.8	5.8	Reviewed draft RFPs and ROGs. Edited existing RFPs and ROGs and drafted list of new RFPs and ROGs that we should serve. Circulated revised RFPs and ROGs to co-counsel by email. Read draft amended complaint and draft brief in support of the motion to a mend. Circulated comments and suggested edits to both by email to co-counsel. Reviewed and suggested edits to Montas and Agro-Paulson declarations. Sent email to Susan Lerner updating her on case and asking for comments.
Powers	11/30/2018	4.6	4.6	Reviewed draft RFPs and ROGs to the New York State Board of Elections. Edited the existing RFPs and ROGs and drafted new ones of my own; sent revised versions to co-counsel for review. Read the draft amended complaint drafted by Dechert, as well as the brief in support of the motion for leave to amend. Circulated comments and suggested edits in email.

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Powers	12/1/2018	2.3	2.3	Reviewed amended complaint drafted by Dechert; conversation with Ezra Rosenberg about the complaint; sent and received emails discussing allegations with respect to voters who are not offered affidavit ballots; make recommendations as to amending certain factual allegations
Powers	12/4/2018	0.6	0.6	Exchange emails with co-counsel re: timing for responding to Ds' discovery requests, review discovery requests
Snow	12/12/2018	1.8	1.8	Phone conference on responding to discovery request; research on EPC disparate impact claims in 2nd Circuit
Powers	12/12/2018	2.7	2.7	Phone conference on responding to discovery request; review Ds' discovery requests (0.8); conduct outreach re: potential expert witnesses (1.9)
Powers	12/14/2018	4.3	4.3	Phone calls with P. McCrary, E. Hersh, M. Meredith, and J. Rodden; follow up phone call with M. Meredith; draft summaries of conversations (1.9); identify published documents (0.8); review Rodden documents (1.2); exchange emails with co-counsel potential expert witnesses (0.4);
Powers	12/15/2018	0.8	0.8	Exchange multiple emails with N. Steiner, E. Rosenberg, and A. Do re: Ds' opposition brief, exchange emails with J. Rodden
Powers	12/17/2018	1.1	1.1	Exchange emails with co-counsel and J. Rodden; review published materials in preparations for calls
Snow	12/18/2018	1	1	Potential expert witness interview call
Powers	12/18/2018	4.8	4.8	Lengthy calls with M. Meredith and J. Rodden and co-counsel, reviewed published materials in preparation for calls, draft questions in anticipation of calls, exchange multiple emails re: calls, review and edit notes from conversations (4); confer with R. Snow and send emails re: outreach to 2017 declarants re: discovery (0.4); call with S. Lerner to discuss case (0.4)
Powers	12/19/2018	2.0	2.0	Talk with L. Wolfe re: case (0.3), exchange emails with co-counsel re: disclosing voter declarations (0.3), draft memo identifying key expert-related issues (1.4)
Powers	12/20/2018	2.8	2.8	Review files for voters' contact information (0.3); confer with J. Conarck and exchange emails with U. Lalovic re: contacting voters (0.4); talk with A. Matika re: case (0.4); exchange emails with co-counsel re: voter declarants (0.3); review draft of FOIL requests to county BOEs, make edits, email redline to co-counsel, phone call with co-counsel re: thereto (1.4)
Powers	12/21/2018	1.9	1.9	Conversation with M. Meredith re: detailed proposal; draft memo re: selecting expert witnesses; follow-up re: voter witnesses and exchange emails with co-counsel re: thereto; exchange emails re: schedule
Snow	1/16/2019	0.5	0.5	Meeting with John Powers to discuss next steps
Powers	1/16/2019	3.2	3.2	Exchange emails with M. Meredith re: analysis; email with co-counsel re: scope of expert analysis; review progress of electronic poll book and universal transfer legislation; undertake legal research and conduct analysis of impact of universal transfer legislation on the case; talk with potential expert witnesses; begin preparing memo re: potential expert witnesses and circulate with team
Snow	1/17/2019	3.9	3.9	Researched and wrote section of NYS Voting Rights proposed legislation summary (2.9); reviewed John's notes thereof (.5); call with co-counsel (.5)
Powers	1/17/2019	2.1	2.1	Conference call with co-counsel (1); review and edit P's second RFPs and email to co-counsel (0.4); conversation with potential expert witness (0.3); finish memo re: potential expert witnesses and circulate with team (0.7)

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Powers	1/18/2019	3.1	3.1	Conversation with M. Meredith (0.3); exchange multiple emails with co-counsel and M. Meredith re: setting up a video conference (0.6); conduct review of batch of FOIL documents, move FOIL responsiveness to shared drive and email A. Do re: thereto (2.2)
Powers	1/22/2019	1.7	1.7	Exchange emails with M. Meredith, co-counsel re: video conference (0.3); confer with S. Lerner and update her on case (0.3); review FOIL responses (1.1)
Powers	1/25/2019	1.5	1.5	Exchange emails and confer with S. Lerner re: legislative reform update and impact of legislative action on this litigation; review revised draft of Second RFPs and provide feedback; exchange emails with T. Jayaraman and confer with E. Rosenberg re: RFAs
Powers	1/27/2019	0.5	0.5	Brainstorm and draft RFAs
Snow	1/28/2019	0.5	0.5	RFAs
Powers	1/28/2019	3.5	3.5	Brainstorm and draft RFAs, exchange emails with co-counsel re: thereto (3.2); confer with R. Snow re: RFAs (0.3);
Powers	1/29/2019	2.8	2.8	Conduct FOIL doc review (1.1); work on NY AG document request attachment for subpoena and conduct attendant research (1.7)
Snow	1/30/2019	1	1	Call with co-counsel
Powers	1/30/2019	2.0	2.0	Conference call with co-counsel to discuss discovery, depositions, co-counsel issues (0.8); complete NY AG doc request attachment for subpoena and email to co-counsel (0.9); confer with R. Snow re: T. Grayson and exchange emails re: thereto (0.3)
Snow	1/31/2019	1	1	Doc review; Grayson email
Powers	1/31/2019	3.4	3.4	Exchange emails with co-counsel re: video conference (0.2); review batch of docs produced by the NYSBOE, tag docs and draft summary identifying hot docs, save hot docs in folder for future use (2.7); review ROG responses from NYSBOE and create spreadsheet identifying which SBOE employees are relevant to particular requests (0.5)
Snow	2/1/2019	1.5	1.5	Tele-conference interview with expert witness
Powers	2/1/2019	3.2	3.2	Review M. Meredith bio and docs, draft set of questions to ask M. Meredith during video conference (1.2); attend video conference with M. Meredith and co-counsel (1.4); work on discovery and expert issues (0.6)
Snow	2/4/2019	1.2	1.2	Call with potential expert Trey Grayson
Powers	2/4/2019	2.1	2.1	Call with potential expert T. Grayson (1.2); compile notes from call and draft memo summarizing potential testimony, analyze pros and cons, and follow-up questions to ask Grayson, and email co-counsel re: thereto (0.9)
Snow	2/5/2019	2	2	Meeting with John RE doc review; doc review
Snow	2/6/2019	6.1	6.1	Doc review (5.8); strategy meeting with John (.3)
Powers	2/6/2019	1.9	1.9	Doc review of NYSBOE production, strategy meeting with R. Snow
Snow	2/7/2019	7.2	7.2	Doc review
Powers	2/7/2019	2.8	2.8	Doc review of NYSBOE production (2); prepare brief memo summarizing key docs and findings and circulate with team (0.5); exchange emails with co-counsel and confer with E. Rosenberg re: deposition schedule (0.3);

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Snow	2/8/2019	1.5	1.5	Call with co-counsel RE discovery/depositions
Powers	2/8/2019	2.2	2.2	Call with co-counsel to discuss discovery, depositions, and schedule; email to counsel re: deposition assignments and schedule (1.2); work on expert issues (0.6); conversation with J. Levitt re: case and expert issues (0.4)
Powers	2/12/2019	3.0	3.0	Reviewed draft subpoenas for the NYCBOE and the NY AG; made edits to the NYCBOE subpoena, prepared redline, and sent to team along with cover email explaining changes (1.8); review election inspector manuals and send memo identifying other counties to whom we should consider sending a subpoena (1); exchange emails with S. Lerner (0.2)
Snow	2/14/2019	0.5	0.5	Call with co-counsel
Powers	2/14/2019	1.3	1.3	Phone call with S. Lerner and co-counsel discussing litigation (0.5); draft and revise memo re: T. Grayson and circulate with team, exchange emails re: thereto (0.8)
Snow	2/15/2019	1	1	Call with Trey Grayson
Powers	2/15/2019	1.2	1.2	Phone call with T. Grayson (1), exchange emails re: M. Meredith agreement and retainer (0.2)
Powers	2/18/2019	3.3	3.3	Review, edit, and redline summary of deficiencies in doc production, review RFP and response, review Ds' production
Powers	2/19/2019	3.6	2.9	Complete review of Ds' deficiencies in their production and send redline to co-counsel (0.9); call with NY BOE counsel for meet and confer regarding discovery responses, depositions, and scheduling (0.8); exchange multiple emails re: Ds' responses, e.g. RFPs 24, 32, 35, and review documents furnished by Dechert team (0.5); review status of NY leg bills that could impact case and send memo re: thereto to counsel (0.7)
Powers	2/20/2019	1.9	1.9	Draft memo re: proposed schedule, trial dates, and practical considerations such as election schedule and need to obtain relief, review, edit, and email to co-counsel, exchange emails with co-counsel re: extension request, review modified case management schedule
Powers	2/22/2019	1.1	1.1	Review draft retainer agreement for Meredith and Morse, edit, redline, and circulate with co-counsel, exchange emails with co-counsel re: thereto, review notes and memo re: scope of work, confer with E. Rosenberg re: thereto
Powers	2/26/2019	0.6	0.6	Exchange emails with T. Grayson (0.2); review proposed schedule, provide feedback, and exchange emails with T. Jayaraman re: thereto (0.4)
Powers	2/27/2019	2.2	2.2	Exchange emails with C. Brill re: NYS voter list (0.3); review questions and email from M. Meredith and draft memo providing responses to Meredith and suggesting next steps (1.4); review letter motion seeking extension of discovery deadlines and offer feedback, exchange multiple emails with co-counsel re: thereto (0.5)
Powers	3/8/2019	1.3	1.3	Exchange emails with T. Jayaraman re: doc collection (0.2); exchange emails with C. Brill re: NY voter file (0.2); exchanged emails with M. Meredith re: NY voter file, documents, schedule, and other issues (0.4); exchanged emails with co-counsel re: deposition schedule, length of depositions, other deposition-related issues (0.3); conversation with A. Saini and C. Duffy re: NY AG subpoena and emails with co-counsel re: thereto (0.4)
Powers	3/11/2019	0.9	0.9	Exchange emails with M. Meredith re: NY voter files and conduct research re: thereto; review semi-annual reports from NYC and share with M. Meredith, confer re: thereto

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Powers	3/12/2019	0.4	0.4	Exchange emails with M. Meredith and C. Brill re: obtaining past NY voter files, and exchange emails with co-counsel re: cost of files and logistics of procuring
Powers	3/13/2019	0.9	0.9	Conversation with T. Grayson re: case, drafting questions, etc., and exchange emails, send Grayson declarations from past cases
Powers	3/14/2019	2.4	2.4	Conversation with J. Chin re: case strategy and other issues; exchange emails with J. Chin and other co-counsel; exchange emails with M. Meredith and send him key docs; exchange emails with co-counsel re: deposition dates; review docs in prep for depositions
Powers	3/15/2019	2.1	2.1	Call voter S. Vinson and confer with J. Conarck re: thereto (0.5); review NYC BOE document production re: several voter witnesses and draft summary of key docs (0.7); conversation with T. Grayson re: working on case, scope of analysis (0.4); draft "purpose and scope" language for T. Grayson retainer and send to T. Jayaraman and N. Steiner for review, and exchange emails re: thereto (0.5)
Powers	3/19/2019	1.1	1.1	Review NYC BOE subpoena and add doc requests in light of NYC BOE document production re: several voter witnesses we just received (0.6); review NYC BOE list maintenance report and sent to M. Meredith (0.2); exchange emails with co-counsel re: NY voter file, subpoenas, depositions (0.3)
Powers	3/20/2019	2.4	2.4	Review T. Grayson retainer agreement, redline, and circulate feedback to co-counsel (); review T. Grayson's proposed terms and exchange emails with T. Grayson and with co-counsel re: retainer agreement and setting up a team call; pull pleadings from case and send to T. Grayson; call with T. Jayaraman to discuss search terms for discovery
Snow	3/21/2019	1	1	Meeting with John RE deposition prep
Powers	3/21/2019	2.9	2.9	Call with R. Snow re: deposition prep (1); review and edit search terms and circulate with co-counsel (0.6); confer with A. Davis V. Richardson J. Conarck R. Snow re: doc review; exchange emails with co-counsel re: doc review (0.5); exchange emails re: doc review; exchange multiple emails with T. Grayson re: retainer agreement, and separate letter re: engagement/no legal service and make further changes to retainer and circulate with co-counsel (0.5); exchange emails with co-counsel re: deposition dates and assignments (0.3)
Snow	3/22/2019	1	1	Call with John RE deposition prep
Powers	3/22/2019	3.2	3.2	Review search terms sent by T. Jayaraman and provide feedback in light of changes made, review J. Chin's suggested additions and provide feedback (0.6); exchange multiple emails with E. Rosenberg and R. Snow re: depositions (0.3); confer with R. Snow re: deposition prep (1); confer with S. Lerner and update her on the case (0.3); review doc production looking for deposition exhibits, confer with A. Davis and V. Richardson re: thereto (1)
Powers	3/25/2019	2.7	2.7	Review NY voter registration file and exchange emails with M. Meredith, T. Jayaraman and N. Steiner re: thereto (0.6); phone call with T. Grayson and co-counsel and exchange emails re: thereto (0.5); join T. Jayaraman and co-counsel in call re: doc review (0.4); continue reviewing docs for depo prep and exchange emails with A. Davis and V. Richardson re: key doc (1); exchange emails re: NY AG/NYC BOE subpoenas (0.2)
Snow	3/26/2019	5.7	5.7	Connolly deposition prep; doc review
Powers	3/26/2019	0.6	0.6	Connolly deposition prep, review poll worker manuals

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Snow	3/27/2019	7.7	7.7	Connolly deposition prep; draft exhibit list
Snow	3/28/2019	4.5	4.5	Connolly deposition prep; draft outline
Snow	3/29/2019	5	5	Connolly deposition prep; draft outline; doc review
Snow	3/30/2019	2	2	Connolly deposition prep; draft outline
Snow	4/1/2019	5.5	5.5	Connolly deposition prep; draft outline; exhibit list; call with expert
Powers	4/1/2019	1.7	1.7	Phone call with M. Meredith re: progress to date and next steps (1); draft summary of conversation and exchange follow-up emails with M. Meredith and co-counsel re: data and timing issues (0.2); confer with S. Lerner re: case by email (0.3); confer with T. Jayaraman re: witnesses and other issues (0.2)
Snow	4/2/2019	4.5	4.5	Common Cause doc review
Powers	4/2/2019	3.9	3.9	Valentine deposition prep, review and cull exhibits, work on exhibit list, deposition outline (2.7); confer with R. Snow and J. Conarck and exchange multiple email T. Jayaraman re: doc review (0.3); review NYC BOE subpoena, redline, suggest additions based on conversation with M. Meredith, send email to co-counsel re: thereto (0.4); review documents and exchange emails with M. Meredith, co-counsel re: scope of Meredith's analysis, additional discovery, and key docs (0.5)
Snow	4/3/2019	3	3	Common Cause doc review
Powers	4/3/2019	1.1	1.1	deposition prep; phone call with M. Meredith re: out of precinct ballots (0.3); review Schoharie County, Cortland County, Nassau poll worker manuals, NYS BOE annual reports from 2015-2017, and exchange emails with M. Meredith and co-counsel re: thereto (0.5); exchange multiple emails with T. Jayaraman and J. Chin re: depositions and logistics (0.3)
Snow	4/4/2019	9	9	Deposition preparation, exhibits and outline (6); meeting with John Powers to discuss same (.5); Common Cause doc review (1.5); research on out-of-precinct voting (1)
Powers	4/4/2019	5.8	5.8	Valentine deposition prep - drafting outline (4); phone call with S. Lerner re: case (0.5); exchange emails with M. Meredith re: data, analysis, research NY Elec Law re: counting out of precinct ballots and prepare summary of research (1); exchange emails with M. Agostinelli re: FOIL requests, T. Jayaraman re: S. Lerner's deposition (0.3)
Snow	4/5/2019	8	8	Connolly deposition prep; exhibits
Powers	4/5/2019	8.8	8.8	Valentine deposition prep - drafting outline, reviewing and culling exhibits; exchange multiple emails with M. Agostinelli, J. Chin, A. Do re: depositions, logistics, potential witness, other issues (0.4); review docs produced by NYSBOE in response to meet and confer (0.5); exchange emails with M. Meredith re: individual voters and their docs (0.3)
Powers	4/6/2019	9.7	9.7	Valentine and Connolly deposition prep - preparing and reviewing outlines, reviewing exhibits
Snow	4/7/2019	5	5	Valentine, Connolly deposition prep; exhibits
Powers	4/7/2019	9.3	9.3	Connolly deposition prep - reviewing exhibits, culling exhibit list, drafting deposition outline, finalize/print/ organize exhibits
Snow	4/8/2019	7	2.5	Travel to Albany (4.5 - NC); Reviewed and edited Valentine depo outline (2.5)
Powers	4/8/2019	11.4	8.9	Travel from Washington DC to Albany (2.5 - NC); Valentine and Connolly deposition prep, work on outlines, finalize, print, organize exhibits (8.6); exchange multiple emails with M. Meredith (0.3)

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Snow	4/9/2019	11	11	Second-chaired Valentine deposition; Reviewed Valentine depo notes; Edited Connolly depo outline; Re-organized exhibits for Connolly
Powers	4/9/2019	12.6	12.6	Prepare for and Valentine deposition; edited Connolly depo outline; re-organized exhibits for Connolly, confer with R. Snow re: thereto, confer with opposing counsel, provide update to co-counsel
Snow	4/10/2019	8	8	Second-chaired Connolly deposition
Powers	4/10/2019	9.3	9.3	Prepare for and take Connolly deposition, confer with R. Snow re: thereto, confer with opposing counsel, provide update to co-counsel
Snow	4/11/2019	8	3.5	Travel from Albany (4.5 - NC); Valentine, Connolly depo summaries; Common Cause doc review
Powers	4/11/2019	7.3	4.7	Travel from Albany to Washington DC to Albany (2.6); prepare and review notes from Valentine and Connolly depositions, draft memo summarizing highlights, and share with co-counsel, review Valentine and Connolly rough deposition transcripts; phone call with H. Bonaccorsi re: FOIL requests and exchange multiple emails re: thereto
Snow	4/12/2019	3	3	Valentine, Connolly depo summaries
Powers	4/12/2019	6.3	6.3	Review Meredith's outline of expert reports, prepare redline for internal use with notes and feedback; review detailed summary of Valentine and Connolly with recommendations as to items for follow-up in future depositions; review revised NYC BOE subpoena with deposition topics, redline, and circulate edits with co-counsel; research addresses for service of NY AG and NYC BOE subpoenas, exchange emails with co-counsel re: thereto; review final Valentine deposition transcript
Snow	4/15/2019	3.6	3.6	Organized Plaintiffs' Exhibits into folder on G drive (2.6). Reviewed Brehm emails for potential exhibits (1)
Powers	4/15/2019	2.3	2.3	Exchange multiple emails with M. Meredith and co-counsel re: call with Meredith; contact NY AG's office and NYC BOE to inform them of impending subpoenas, exchange emails with T. Jayaraman and co-counsel re: thereto and service of subpoenas; review final Connolly deposition transcript; review Valentine and Connolly deposition exhibits to see if any are valuable for R. Brehm, exchange emails with A. Do re: thereto
Snow	4/16/2019	3	3	Organized files (1). Added page and line citations to Valentine deposition summary (2).
Powers	4/16/2019	2.4	2.4	Review of M. Meredith expert report outline and draft internal notes; phone call with M. Meredith; draft summary of call with M. Meredith and circulate with co-counsel along with follow up items/questions; exchange emails with T. Grayson re: status update; exchange emails with court reporter and opposing counsel re: Connolly deposition exhibit; exchange emails with T. Jayaraman re: S. Lerner deposition
Snow	4/17/2019	6.5	6.5	Added page and line citations to Valentine and Connolly deposition summaries, while compiling list of errata.
Powers	4/17/2019	1.4	1.4	Draft brief memo re: new topics/ sets of questions to ask R. Brehm in his deposition; exchange emails with T. Grayson re: rough of report and setting up call to discuss, and circulate with co-counsel; review errors in Valentine and Connolly depo transcripts
Snow	4/18/2019	3	3	Added page and line citations to Valentine and Connolly deposition summaries, while compiling list of errata.
Powers	4/18/2019	0.7	0.7	Review Valentine deposition and exchange emails with M. Meredith re: thereto, exchange emails with M. Meredith re: individual voter docs, exchange emails with T. Jayaraman re: errata

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Snow	4/19/2019	5	5	Reviewed supplemental SBOE production (3). Met with John Powers to discuss (0.5). Reviewed and notated draft of expert report of Trey Grayson (1.5).
Powers	4/19/2019	1.4	1.4	Confer with R. Snow re: supplemental SBOE production (0.5); begin reviewing draft of T. Grayson report (0.5); review Ds' latest production on Relativity (0.4)
Snow	4/20/2019	3	3	Added page and line citations to Valentine and Connolly deposition summaries, while compiling list of errata.
Snow	4/21/2019	2	2	Reviewed supplemental SBOE production (1). Added page and line citations to Valentine and Connolly deposition summaries; compiled list of errata (1).
Powers	4/21/2019	1.6	1.6	Review draft of T. Grayson report in detail; exchange emails with co-counsel re: T. Grayson report; review summaries of Connolly deposition; review errata for Valentine and Connolly depositions
Snow	4/22/2019	8.5	8.5	Compiled list of errata for Valentine and Connolly depositions; added to key points notes; met with John Powers to discuss same (6.7). Emails with co-counsel RE strategy, questions for remaining depositions (0.8). Call with expert witness Trey Grayson (1).
Powers	4/22/2019	5.1	5.1	Review draft expert report prepared by T. Grayson; prepare list of issues and talking points for phone conference with T. Grayson; led phone conference with T. Grayson discussing his draft report; conversation with R. Snow re: Valentine and Connolly errata; email to co-counsel re: Valentine and Connolly errata; draft email to M. Meredith to look up voting history of nine individual voters; review declarations signed by individual voters in this case and draft summaries of all of them, rank them in order of relevance to this case and circulate analysis with co-counsel
Powers	4/23/2019	4.1	4.1	review the Valentine and Connolly errata prepared by R. Snow; email to opposing counsel and court reporter re the same; emails to and from T. Jayaraman re: S. Lerner deposition prep schedule next week; conversation with S. Lerner updating her on the case, discussing her deposition, and scheduling deposition prep session (0.4); emails to and from S. Lerner re: her upcoming deposition; review some of S. Lerner's emails related to this case (0.3); review NYC BOE self-audit and pass along to M. Meredith
Snow	4/24/2019	3.5	3.5	Reviewed Brehm deposition transcript (1.5). Drafted RFAs regarding status, affidavit ballot disposition of voter declarants (2).
Powers	4/24/2019	3.6	3.6	Email exchange with N. Steiner re: need to produce the individual voter declarations; review the Defendants' RFPs to see if voter declarations are encompassed within one or more of the RFPs; write up legal analysis on this point and circulate with the team; draft email to opposing counsel re: individuals who plaintiffs may ultimately call at trial; review Meredith email describing which of voters' affidavit ballots were or were not counted and their registration status and revise individual voter tiers based on that information, and send email to co-counsel re: the same
Snow	4/25/2019	3.3	3.3	Drafted RFAs regarding status, affidavit ballot disposition of voter declarants (2.3). Met with John Powers; called declarant Susan Stewart to discuss witness deposition preparation and schedule (1).
Powers	4/25/2019	3.1	3.1	Draft and review RFAs regarding individual voters; conversation with T. Jayaraman; email with T. Jayaraman re: individual voter declarations; briefly review B. Brehm deposition transcript
Snow	4/26/2019	0.5	0.5	Called declarants to discuss witness deposition preparation and schedule.

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Powers	4/26/2019	1.1	1.1	Emails with M. Meredith regarding his progress re: drafting his report, the NYC BOE releasing docs, and other other issues related to the case (0.5); emails with co-counsel and opposing counsel regarding individual voter witness depositions and declarati ons (0.4); send follow up email to co-counsel re: RFAs (0.2)
Powers	4/27/2019	0.8	0.8	Begin review of Meredith draft expert report and circulate his draft with co-counsel to solicit their feedback
Powers	4/28/2019	7.1	3.4	Travel from Washington DC to NYC by train for Lerner deposition (3.7 - NC); review Meredith report and draft feedback for call the next day (3.4)
Snow	4/29/2019	1	1	Reviewed draft of Meredith expert report
Powers	4/29/2019	7.5	7.5	Review draft expert report prepared by M. Meredith and prepare list of talking points for phone conference, emails to and from co-counsel re: Meredith's draft report and his deposition, emails to and from Meredith re: scheduling phone call (1.9); prepare for and in phone call with Marc Meredith and co-counsel to discuss draft of his expert report and provide feedback (2.9); Draft mock deposition questions for Susan Lerner (0.8); draft list of topics about which Lerner might be deposed, review CCNY documents, draft questions, prepare for Susan Lerner deposition prep (3);
Snow	4/30/2019	1.2	1.2	Call with Declarant Baldus RE deposition schedule, case update (0.5). Emails with John Powers RE plaintiffs' supplemental production (0.7).
Powers	4/30/2019	5.2	5.2	Deposition prep with Susan Lerner (2.1); Review documents that Defendants might use to depose Susan Lerner; other prepare and participate in Susan Lerner deposition prep; review and edit Google spreadsheet re: individual voter witness status, including Baldus; review past emails to locate Agro-Paulson's phone number; review Ps' production and make sure that spreadsheet referenced by S .Lerner during deposition prep the previous day was produced; send emai to T. Jayaraman and other Dechert co-counsel about the same, send emails to M. Aghostinel li and Dechert co-counsel to ask about status; save Ps' productions in Dropbox folder and ask R. Snow for further assistance; send email to N. Steiner summarizing the rest of deposition prep after he left the previous day
Powers	5/1/2019	8.4	4.8	Meet with Ms. Lerner to discuss deposition and prep (0.3); attend and participate in Ms. Lerner's deposition (3.7); meet with Ms. Lerner to discuss the deposition and the case (0.8); travel from NYC to Washington DC by train (3.6 - NC);
Snow	5/2/2019	6.6	6.6	Reviewed Dechert's person search info for potential witnesses (2.3). Called and emailed declarants and potential witnesses RE deposition availability, scheduling (3.8). Met with John Powers to discuss witness deposition strategy. (0.5).
Powers	5/2/2019	0.5	0.5	Conversation with R. Snow re: status of outreach to individual voter witnesses, need to summarize status and next steps (0.3); emails to R. Snow re: thereto (0.2)
Snow	5/3/2019	6.5	6.5	Called and emailed declarants and witnesses regarding availability for depositions (2.7). Met with John Powers to discuss witness availability (.3). Created list of witnesses and deposition availability (2). Edited Second RFAs (1.5).

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Powers	5/3/2019	2.3	2.3	Drafted summary of Susan Lerner deposition and sent it to E. Rosenberg (0.5); draft memorandum summarizing the circumstances and the statuses of individual voter witnesses, including availability for deposition, and circulate with the team by email (0.8) ; review RFAs, make final changes, finalize, and separate email exchange with M. Aghostinelli and R. Snow re: thereto (0.5); conversation with R. Snow about the availability and status of witnesses Lauren Wolfe, Denise Roberts, etc. for deposition (0.3); review emails to and from Lauren Wolfe and send email to R. Snow with docs he can send to her (0.2)
Powers	5/6/2019	0.3	0.3	Confer with co-counsel re: NY OAG subpoena and email to counsel re: voter info
Snow	5/7/2019	1.5	1.5	Met with John to discuss witness deposition strategy (0.5). Call with co-counsel to discuss witness deposition strategy and discovery schedule (1).
Rosenberg	5/7/2019	0.8	0	Confer with J Powers re discovery issues; confer with Dechert team re thereto
Powers	5/7/2019	3.8	3.8	Phone call with Jayaraman/Steiner/Rosenberg to discuss individual depositions, status of discovery, schedule extension (0.6); arranging phone calls; emails with experts (0.4); reviewed Marc Meredith's second draft of expert report (2.8)
Snow	5/8/2019	4.3	4.3	Call with Expert Meredith (2). Call with Expert Grayson (1.3). Called and emailed witnesses RE depositions (1).
Powers	5/8/2019	4.8	4.8	Participated in phone call with Marc Meredith and co-counsel to discuss the latest draft of his expert report and provide feedback (2); reviewed and marked up Grayson's expert report for internal purposes (1.3); participated in phone call with Trey Grayson and co-counsel to discuss the latest draft of his expert report and provide feedback (1); call with Nancy Feldman (0.2); emails with R. Snow, M. Feder and N. Steiner, and Marc Meredith (0.3)
Powers	5/9/2019	2.2	2.2	Devise proposed schedule extension and create new case management plan (0.6); exchange numerous emails with team, including N. Steiner and T. Jayaraman, regarding the appropriate extension; draft proposed schedule for individual voter depositions based on counsel schedule and individual voter availability; draft emails to opposing counsel W. McCann and N. Cartagena re: proposed schedule extension and proposed deposition dates for individual voter plaintiffs
Powers	5/10/2019	1.5	1.5	Spoke with NY OAG AAG J. Cooney regarding the NY OAG's position and response with respect to Plaintiffs' subpoena (0.4); emails to and from J. Cooney, and exchanged emails with N. Steiner and J. Perez re: phone call (0.3); drafted summary of conversation with J. Cooney and circulated with team (0.3); briefly reviewed expert Marc Meredith's third draft of expert report and circulated with the team by email (0.3); reviewed email from N. Cartagena and sent email to co-counsel about it with proposal re: individual voter depositions (0.2)
Snow	5/13/2019	1.7	1.7	Emails and calls with voters RE depositions (1). Drafted and edited pro hac vice motion (.7).
Powers	5/14/2019	2.7	2.7	Review draft of T. Grayson report, mark up and flag comments to share on phone call, and circulate my suggestions with the team by email with proposal as to next steps with T. Grayson (2.1), exchange multiple emails with E. Rosenberg and M. Feder regarding T. Grayson and M. Meredith's reports and plan of action/ next steps (0.4); exchange emails with R. Snow re: deposition notice (0.2)
Snow	5/15/2019	4	2	Drafted and edited notice of deposition for Holman and Roberts (1). Created notice of subpoena for Holman and Roberts (1). Booked flights, hotels, and rental car (2 - NC).
Snow	5/16/2019	1	1	Emails with deponents (.5). Prepared Pro Hac Vice admission documents (.5)

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Snow	5/17/2019	5.4	5.4	Reviewed and commented on report by Expert Grayson (1). Call with voter witness Goldberg (.4). Drafted Goldberg declaration (2). Prepared Pro Hac Vice admission documents, applied for ECF submission privileges (2)
Powers	5/17/2019	1.6	1.6	Participated in phone call with Trey Grayson and co-counsel to discuss the latest draft of his expert report and provide feedback (0.9); phone call with R. Snow and voter Stephanie Goldberg (0.4); exchange emails with co-counsel re: expert reports and other issues (0.3)
Snow	5/20/2019	1	1	Goldberg declaration revisions
Powers	5/20/2019	3.0	3.0	Review and draft internal feedback notes regarding the third draft of M. Meredith's report and send emails re: same to co-counsel (3.0)
Snow	5/21/2019	0.5	0.5	Called deponents Holman and Roberts and served subpoenas via email
Powers	5/22/2019	4.6	4.6	Review and comment on latest draft of M. Meredith expert report, participated in phone call with Marc Meredith and co-counsel to discuss the latest draft of his expert report and provide feedback (4.1); phone call with Jim Cooney from the NY AG's office to discuss the AG's compliance with P's subpoena (0.5)
Powers	5/24/2019	11.8	3.3	Travel from Atlanta to NYC by plane and Lyft (4.5 - NC); prepare for hearing, meeting with N. Steiner, met with SBOE counsel, attend and participate in hearing (3.3); Travel from NYC to Washington DC by train (4 - NC)
Snow	5/28/2019	1	1	Call with expert Trey Grayson
Powers	5/28/2019	2.2	2.2	Review Grayson expert report, mark up and take notes re: discussion points, and participate in phone call with Trey Grayson and co-counsel to discuss the latest draft of his expert report and provide feedback, and exchange emails with co-counsel re: thereto (2.2);
Snow	5/29/2019	2	2	Call with Goldberg; revised and finalized Goldberg Declaration
Powers	5/29/2019	1.2	1.2	Exchange emails with T. Grayson, M. Meredith, and co-counsel re: latest drafts of their expert reports (0.4); began reviewing fourth draft of M. Meredith's report (0.8)
Powers	5/30/2019	3.5	3.5	Prepare for and participated in phone call to Magistrate Judges chambers with W. McCann, B. Quail, N. Steiner and others, review fourth draft of Meredith's expert report, exchange emails with co-counsel re: setting up a call with M. Meredith, exchange emails with S. Lerner and co-counsel re: scheduling settlement conference (3.5)
Powers	6/2/2019	2.4	2.4	Continued review and drafting internal comments on fourth draft of M. Meredith's expert report to prepare for call
Powers	6/3/2019	1.6	1.6	Prepare for and participate in phone call with Marc Meredith and co-counsel to discuss the latest draft of his expert report and provide feedback (1.6);
Powers	6/7/2019	4.2	4.2	Review and revise fifth draft of M. Meredith's expert report (4.2)

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Powers	6/10/2019	2.7	2.7	Conversation with R. Savino regarding subpoena to the NYC BOE and confer with co-counsel re: same (0.4); email to T. Jayaraman, N. Steiner, E. Rosenberg, etc. summarizing conversation with R. Savino and asking if proof of service is available (0.3); conversation with J. Cooney regarding subpoena to the NY AG (0.2); emails to R. Savino following up on conversation and sending subpoena and proof of service (0.3); confer with co-counsel re: settlement conference and call with W. McCann and call to clerk's office to schedule settlement conference (0.5), finalize and serve Dr. Meredith's expert report (1.2)
Snow	6/11/2019	2.5	2.5	Holman depo prep (2). Met with John Powers to discuss Holman depo prep (.5).
Snow	6/12/2019	0.4	0.4	Holman depo prep
Snow	6/14/2019	1.9	1.9	Holman and Roberts depo prep
Powers	6/14/2019	2.9	2.9	Prepare for Roberts and Holman depositions, including holding a phone call with Roberts, reviewing documents, working on deposition outline, locating, preparing, printing, and organizing deposition exhibits
Powers	6/15/2019	3.8	3.8	Edit and revise Roberts deposition outline, draft potential questions that Roberts may be asked by opposing counsel during their portion of the deposition for preparation purposes
Snow	6/17/2019	9.9	4.5	Travel DC-Endicott (5.4 - NC). Met with Denise Roberts to discuss deposition, exhibits (1.5). Reviewed Denise Roberts deposition outline (1). Call with co-counsel RE discovery strategy, timeline (1). Reviewed Robert Holman deposition exhibits (1).
Powers	6/17/2019	10.7	5.3	Travel to Binghamton NY by flying to Syracuse and driving a rental car (5 - NC); drive to Denise Roberts' residence (0.4 - NC); deposition prep session with Denise Roberts where we discuss the case, ground rules for her deposition, and her experience attempting to vote in the Nov. 2016 election (1.4); edit and revise outline of questions for Ms. Roberts' deposition to account for new information (2.7); prepare new exhibits for Ms. Roberts' deposition and finalize other exhibits (0.7); NY team call with N. Steiner, T. Jayaraman, E. Rosenberg, et. al to discuss Ds' initial disclosures, subpoenas to NY AG and NYC BOE, status of experts, and provide update re: Roberts/Holman
Snow	6/18/2019	6.9	3.3	Travel Endicott-Buffalo (3.6 - NC). Deposition of Denise Roberts (3.3).
Powers	6/18/2019	6.9	3.3	Meet with Ms. Roberts to discuss deposition, cross, and prep (0.8); prepare for, attend and participate in Ms. Roberts' deposition (1.9); talk with Ms. Roberts and Mr. Snow after the deposition about the case and next steps (0.6); drive from Binghamton to Buffalo (3.6 - NC)
Snow	6/19/2019	7	7	Prepared and met with Robert Holman to discuss deposition and exhibits (2.5). Completed Robert Holman deposition outline (3.5). Reviewed Robert Holman outline and exhibits (1).
Powers	6/19/2019	4.5	4.5	Prepared for and participated in deposition prep session with Robert Holman where we discuss the case, ground rules for his deposition, and his experience attempting to vote in the Nov. 2016 election (2.5); review outline of questions for R. Holman's deposition prepared by R. Snow and provide feedback (1.1); review R. Snow's proposed exhibits for R. Holman's deposition and provide feedback (0.4); call with Jim Cooney with the NY AG's office to discuss the AG's office's compliance with subpoena and email follow up (0.5)
Snow	6/20/2019	5.3	2.8	Deposition of Robert Holman (2). Discussed deposition of Robert Holman with John Powers (.8). Travel Buffalo-DC, delayed and cancelled flights (2.5 - NC).

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Powers	6/20/2019	8.5	3.7	Meet with Mr. Holman to discuss deposition and prep (0.6); attend and participate in Mr. Holman's deposition (1.5); talk with R. Holman and R. Snow after the deposition re: the status of the case, the deposition, and next steps (0.3); confer with R. Snow about the depositions and next steps (0.5); travel from Buffalo to Washington DC (4.8 - NC); prepare for and participate in call with S. Richman and R. Savino from the NYC BOE to discuss the BOE's compliance with the P's subpoena and exchange emails with them and with co-counsel re: thereto (0.8)
Snow	6/21/2019	7	1	Travel Buffalo-DC, delayed flight and rerouted through Chicago (6 - NC). Reviewed Denise Roberts deposition transcript (1).
Snow	6/24/2019	2.7	2.7	Angela Roberts call (.5); Drafted declaration (2.5).
Snow	6/25/2019	1	1	Revised Angela Roberts declaration; met with John Powers to discuss same (1).
Powers	6/25/2019	1.0	1.0	Review Angela Roberts declaration and provide substantial edits, confer with R. Snow re: thereto (1)
Powers	6/26/2019	0.7	0.7	Exchange emails and work on discovery issues re: motion to compel and confer with N. Steiner (0.8);
Powers	6/27/2019	1.3	1.3	Participate in conference call with NY AG and SBOE, confer with N. Steiner, email correspondence with co-counsel re: discovery issues and need for motion to compel
Powers	6/28/2019	0.4	0.4	Review Ps' letter motion to compel compliance with subpoena and for extension of discovery (0.4)
Snow	7/1/2019	1.2	1.2	Emails, text messages, and phone calls with Angela Roberts RE her declaration (.5). Reviewed and separated voter records from group pdf (.7).
Powers	7/1/2019	3.1	3.1	Continue work on NYCBOE discovery issues, including reviewing state response to motion to compel and confer with N. Steiner, and exchange emails with co-counsel (1.2); edit/finalize Angela Roberts declaration, exchange emails with R. Snow re: thereto, prepare for service, and circulate with co-counsel (0.8); exchange multiple emails with opposing counsel to schedule M. Meredith's deposition and confer with M. Meredith to schedule deposition, discuss deposition logistics (0.7); review legal research on CCNY standing and corporation issue, exchange emails with N. Steiner re: thereto (0.4);
Snow	7/2/2019	1	1	Reviewed documents RE Nassau and Schoharie County poll book practices
Snow	7/3/2019	1	1	Emails and calls with Denise and Angela Roberts RE thanks and what to expect moving forward
Powers	7/9/2019	0.3	0.3	Participate in call to Magistrate Judge's chambers and confer with co-counsel re: thereto (0.3);
Powers	7/15/2019	1.3	1.3	Call with Jim Cooney to discuss redactions to documents produced by NY AG; exchange emails with J. Cooney, email correspondence with co-counsel (1.3)
Rosenberg	7/16/2019	0.5	0	Confer with N Steiner and J Powers re settlement issues
Powers	7/16/2019	0.5	0.5	Call with N. Steiner and E. Rosenberg re: settlement issues (0.5)
Snow	7/17/2019	1	1	Reviewed and edited draft of internal settlement memo
Rosenberg	7/17/2019	0.3	0	Review submission to court re settlement position
Powers	7/17/2019	0.3	0.3	Call with T. Jayaraman, N. Steiner et. al to discuss ex parte settlement letter; review letter motion to court re: settlement position (0.3)
Powers	7/18/2019	2.8	2.8	Call with B. Quail, W. McCann, T. Jayaraman, et. al to discuss settlement, pre-call with T. Jayaraman to discuss strategy, exchange emails and phone calls with T. Jayaraman and N. Steiner before and after the call with opposing counsel re: settlement, review and substantial edit settlement letter (2.8)

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Powers	7/19/2019	0.7	0.7	Exchange multiple emails with N. Steiner, E. Rosenberg, S. Lerner, and other co-counsel re: settlement, laying out the merits of a decision and potential next steps (0.7)
Powers	7/22/2019	0.9	0.9	Confer with E. Rosenberg re: settlement and exchange emails with co-counsel re: settlement (0.4); draft proposed search terms for the NYC BOE to use when searching for documents electronically and exchange emails with co-counsel re: thereto (0.5)
Powers	7/23/2019	0.3	0.3	Exchange emails with N. Steiner, T. Jayaraman, and M. Meredith re: Meredith's deposition, logistics, and prep
Rosenberg	7/25/2019	0.5	0	Multi-emails to and from N Steiner, J Greenbaum, and J Power re settlement issues
Powers	7/25/2019	0.4	0.4	Exchange multiple emails with N. Steiner, E. Rosenberg, J. Greenbaum re: mediation, state's offer, our position, etc.
Powers	7/26/2019	0.9	0.9	Call with N. Steiner, E. Rosenberg, J. Greenbaum to discuss the pros and cons of agreeing to settlement offer and approach/strategy for settlement discussions, exchange multiple emails with N. Steiner, J. Greenbaum, E. Rosenberg re: settlement and related issues (0.5); review joint status letter regarding subpoena to the NYC BOE (0.4)
Powers	7/28/2019	1.0	1.0	Email to R. Snow and other co-counsel re: witness tiers, outreach to witnesses, etc. (0.3); review NY AG's proposed joint stipulation in detail, identify paragraphs for potential revision, prepare redline, and circulate with co-counsel for their feedback (0.7);
Powers	7/29/2019	6.8	2.7	Travel from Washington DC to NYC by train (4.1 - NC); review joint status letter regarding discovery (0.3); confer with E. Rosenberg at length re: status of trial preparation and related strategic issues (0.4); exchange emails with co-counsel re: S. Lerner doc review and production (0.2); exchange emails with co-counsel and opposing counsel re: Meredith deposition and related logistics (0.2); exchange emails with co-counsel and email J. Cooney to discuss changes to proposed stipulation of confidentiality (0.5); draft a set of practice questions that Ds may ask M. Meredith at his deposition for prep purposes (1.1)
Powers	7/30/2019	5.9	5.9	Deposition prep session with Marc Meredith where we discuss the case, ground rules for his deposition, his report, discuss potential questions he may be asked, and practice in preparation for deposition (5.9)
Powers	7/31/2019	7.3	4.4	Attended and participated in the deposition of Marc Meredith (2.8); meet with M. Meredith before and after the deposition and discuss the case and the deposition after its conclusion (0.4); confer with N. Steiner re: Meredith deposition and next steps (0.5); prepare summary of M. Meredith deposition and circulate with co-counsel by email, and exchange emails with co-counsel re: thereto (0.7); travel from NYC to Washington DC by train (3.9 - NC);
Snow	8/1/2019	2.5	2.5	Met with John Powers to discuss recent development, prep for trial (1). Reviewed Expert Meredith deposition notes, emails with co-counsel (1). Call with Expert Meredith to debrief from deposition (.5).
Powers	8/1/2019	2.6	2.6	Call to chambers with N. Steiner, T. Jayaraman et. al (0.3); exchange emails with co-counsel and confer with R. Snow re: Meredith deposition, trial prep and recent developments in the case (1); call with M. Meredith to debrief re: deposition and discuss next steps in terms of case and testimony at trial (0.5); review stipulation of confidentiality and make edits and exchange multiple emails in different threads with J. Cooney, T. Jayaraman, N. Steiner re: thereto (0.8)
Snow	8/2/2019	2.5	2.5	Reviewed and edited voter witness docs (2.5)

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Powers	8/2/2019	0.2	0.2	Exchange emails with co-counsel re: NYC affidavit ballot envelopes, direct exams for trial, and other case-related issues
Powers	8/5/2019	0.3	0.3	Exchange multiple emails with co-counsel and with opposing counsel re: transcript-related issues
Snow	8/6/2019	1.7	1.7	Reviewed and edited voter witness docs (1.7)
Powers	8/6/2019	0.5	0.5	Conversation with T. Grayson to discuss the case trial and related logistics, exchange emails to coordinate
Snow	8/7/2019	2.9	2.9	Reviewed and edited voter witness docs (2.7). Updated Dropbox with combined voter witness docs
Powers	8/7/2019	0.3	0.3	Exchange emails with M. Meredith re: NYC affidavit ballots and related logistics, and review emails from co-counsel re: thereto
Powers	8/8/2019	1.9	1.9	Conversation with W. McCann re: NY practices re: deposition transcripts and exchange emails with N. Steiner and T. Jayaraman re: thereto and other dep transcript issues, email S. Lerner and S. Goff re: deposition transcripts (0.8); make travel arrangements and exchange emails with M. Meredith and T. Grayson re: trial logistics and travel arrangements for trial (1.1)
Snow	8/12/2019	4.8	4.8	Edited and combined voter doc pdfs; found contact info for voter-witnesses (1.7). Called, emailed voter-witnesses (3.1).
Powers	8/12/2019	0.6	0.6	Phone call with M. Meredith re: NYC affidavit ballots (0.2); exchange emails with M. Meredith and co-counsel re: thereto (0.2); exchange emails with S. Goff re: transcript errata (0.2)
Snow	8/13/2019	9	7.5	Called, emailed, mailed communications to voter-witnesses RE case update and trial availability (7.5). Discussed conversation with Lauren Wolfe with John Powers (.5 - NC). Wrote memo discussing communications and development possibilities related to Lauren Wolfe (1 - NC).
Powers	8/13/2019	1.6	1.6	Review draft of Montas declaration and exchange multiple emails with R. Snow re: Montas and voter declarations, review files to look for voter phone numbers (0.5), exchange emails with W. McCann re: transcript issues, review S. Lerner and S. Goff dep exhibits and send to them (0.3); confer with E. Rosenberg and draft memo and send to N. Steiner, E. Rosenberg, T. Jayaraman re: the pros and cons of calling V. Martin as a witness in this case and summarizing potential testimony, and exchange multiple emails with N. Steiner re: thereto (0.8)
Snow	8/14/2019	5.1	3.3	Reviewed voter-witness docs, edited list of potential witnesses to call at trial (3.3). Met with Reynolds Graves to discuss communications strategy (.8 - NC). Reviewed notes from meeting, emailed John Powers RE media strategy (1 - NC).
Powers	8/14/2019	1.3	0.5	Discussion re: messaging with R. Snow and exchanged emails with R. Snow and R. Graves re: thereto (0.8 - NC); exchange multiple emails with V. Martin (0.3); additional emails with W. McCann and N. Steiner/T. Jayaraman re: transcript issues (0.2)
Snow	8/15/2019	0.7	0.7	Reviewed voter-witness docs, edited list of potential witnesses to call at trial (.7)
Powers	8/15/2019	1.1	1.1	Phone call with V. Martin to discuss the case, election practices in Columbia County, and the feasibility of her testifying as a witness in this case (0.6); reviewed Columbia County BOE website and training and election related materials (0.5)
Snow	8/16/2019	0.3	0.3	Call with Kate Baldus (.3)

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Snow	8/19/2019	3.9	3.9	Reviewed declarants' voter records; edited list of potential Trial Witnesses (2.3). Reviewed Plaintiffs' production to find bates-stamped versions of witness declarations, copied and labeled on shared drive (.9). Investigated Columbia County, NY possible use of supplemental/inactive poll books (.7).
Powers	8/19/2019	1.0	1.0	Reviewed declarants' voter records (0.6), exchanged multiple emails with R. Snow re: witness declarations and searched files for them (0.4)
Snow	8/20/2019	0.7	0	Revised Comms memo (.7 - NC)
Snow	8/21/2019	3.8	0	Revised Comms memo (3.8 - NC)
Snow	8/22/2019	3.5	3.5	Reviewed voter docs produced by Defs.; pulled relevant docs and added to existing files (3); Called and emailed voter witness RE case update and trial availability (.5)
Snow	8/23/2019	0.6	0.6	Reviewed Montas voter records, declaration; call with John Powers to discuss whether to take declaration (.6)
Powers	8/23/2019	1.5	1.5	Discussed Montas and voter declarations with R. Snow and exchanged emails re: thereto (0.4); review Columbia County documents and Martin declarations from Curling case and begin drafting the Martin declaration (1.1)
Snow	8/26/2019	4.4	2.5	Met with Reynolds Graves and John Powers to discuss communications and development strategy; revised Comms memo (1.9 - NC). Reviewed local rules and judge's rules governing pretrial procedures (1). Reviewed voter docs produced by Defs.; pulled relevant docs and added to existing files (1); Called and emailed voter witness RE case update and trial availability (.5).
Powers	8/26/2019	4.2	2.6	Met with R. Snow and R. Reynolds to discuss communications and development strategy, reviewed and suggested edits to Comms memo (1.6 - NC); exchange emails with N. Steiner re: Ryan deposition, V. Martin declaration, pre-trial papers and assignments, and transcript errata (0.3); continue drafting V. Martin declaration, discuss with her on the phone, incorporate feedback, and email draft to her and co-counsel for review (2.3)
Snow	8/27/2019	1.5	1.5	Reviewed Local Rules, Individual Rules of Judge Nathan RE trial procedures (1.5).
Powers	8/29/2019	0.4	0.4	Exchange emails with N. Steiner re: Ryan deposition and the attendance of S. Lerner, emails with V. Martin re: declaration (0.4)
Snow	8/30/2019	1	1	Took declaration of Gregory Montas (1)
Snow	9/3/2019	2.2	2.2	Revised Montas Declaration (1). Call with co-counsel RE trial prep (1.2).
Powers	9/3/2019	2.9	2.9	Call with N. Steiner, E. Rosenberg, T. Jayaraman, K. Shorey, R. Snow, A. Davis to discuss trial prep, procedures, strategy, and other issues, and send emails re: thereto (1.2); Reviewed draft of Montas declaration and provided feedback (0.7); review feedback from V. Martin re: declaration, edit, finalize, obtain signature for, and complete V. Martin declaration, exchange emails with V. Martin and K. Shorey re: service of declaration (1.0);
Snow	9/4/2019	0.5	0.5	Revised and emailed Montas Declaration draft; reviewed op-ed discussing voting issues in Queens DA race (.5).
Powers	9/4/2019	1.3	1.3	Review transcript of Meredith deposition, talk with M. Meredith about deposition, errata process, and trial testimony (1.3)
Snow	9/5/2019	6.5	6.5	Reviewed pretrial action items (.5). Compiled and shared exhibits for trial; calls and emails with co-counsel to discuss pretrial action items (6).

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Powers	9/5/2019	6.7	6.7	Call with K. Shorey, R. Snow re: document review, calls and emails with co-counsel re: assignments for deposition designations, drafting FOF/COL and pre-trial brief, and review of exhibits (0.8); review files to prepare Bates-numbered deposition transcripts and exhibits for all affected voters (0.9); emails with H. Bonaccorsi re: M. Meredith report (0.2), updated Google drive folder to add the Brehm/Conklin/ Couser exhibits (0.4), review latest production of NY AG docs (1.3), exchange multiple emails with N. Steiner and other co-counsel re: talking and agreeing to stipulate to certain documents (0.4); draft list of trial witnesses with summaries of the areas in which each witness might testify, including our friendly witnesses and hostile witnesses, and lay and expert witnesses (1.6), draft list of categories of documents to which we might be able to stipulate with the NYC BOE and circulate with co-counsel by email (0.5); confer with co-counsel re: pre-trial issues (0.6);
Snow	9/6/2019	4	4	Doc Review of subpoena docs; identified docs for use at trial (2). Call with Defendants RE discovery process, stipulations (1). Emails with co-counsel (1).
Rosenberg	9/6/2019	0.5	0	Multi-emails to and from N Steiner and J Powers re issues relating to standing proofs
Powers	9/6/2019	4.0	4.0	Call with N. Steiner, T. Jayaraman, K. Shorey to discuss trial exhibits, stipulations with Ds, and conference call with opposing counsel to discuss the same (1.1); draft notes summarizing call with opposing counsel and circulate with the team (0.4); draft list of documents to which we can stipulate based on the conversation with opposing counsel (0.4); multiple emails to and from N. Steiner and E. Rosenberg re: legal standard for standing (0.5); review revised witness list (0.3); exchange emails with N. Steiner and E. Rosenberg re: NYCBOE doc production and transferring docs in Box (0.3); exchange emails re: deposition designations and begin working on deposition designations (0.7); exchange emails with M. Meredith and co-counsel re: trial logistics (0.3)
Powers	9/7/2019	3.8	3.8	Draft memo regarding dispute over disclosing voter witnesses, review prior emails with opposing counsel over the issue, and share with N. Steiner by email (0.9); conduct legal research and draft legal memo on precedent supporting CCNY's standing, CCNY is a division of CC national, and CCNY would have standing even if it was an unincorporated association (2.9);
Powers	9/9/2019	5.1	5.1	Exchanges multiple emails with N. Steiner re: disclosing voter witness issue, draft email to N. Cartagena re: same (0.6); reviewed Roberts and Holman deposition transcripts and prepared a draft set of depo designations and circulated with the team by email (3.2); exchange emails with T. Jayaraman re: pre-trial deposition summaries and logistics (0.3); exchange emails with M. Meredith re: affidavit ballot envelope analysis (0.3); exchange emails with B. Quail re: AG doc production (0.2); review memo re: CCNY's standing, edit, and circulate with the team by email (0.5)
Snow	9/10/2019	0.5	0.5	Call with John Powers; Emails with co-counsel (.5)
Rosenberg	9/10/2019	0.4	0	Confer with J Powers at length re status of trial preparation and strategic issues re thereto

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Powers	9/10/2019	11.1	7.0	Travel from Washington DC to NYC by train (4.1 - NC); review joint status letter regarding discovery (0.3); confer with E. Rosenberg at length re: status of trial preparation and related strategic issues (0.4); exchange emails with co-counsel and separate emails with M. Meredith and T. Grayson re: documents/materials they relied on for his expert report (0.4); phone call with T. Grayson regarding documents (0.3); review affidavit ballot envelopes and send email to co-counsel regarding specific envelopes we should disclose and others we should not disclose and the utility of M. Meredith's analysis (0.6); exchange emails with M. Meredith and T. Grayson regarding coordinating trial logistics and travel (0.3); conversation with E. Rosenberg and exchange emails with N. Steiner, E. Rosenberg et. al and exchange email with opposing counsel re: seeking a weeklong extension of the deadline for filing pretrial materials (0.4); review Connolly and Valentine deposition transcripts to identify helpful testimony/questions for potential cross-examination/potential depo designations (4.1); exchange emails with co-counsel regarding which witnesses we should prepare deposition designations for (0.2);
Snow	9/11/2019	3.2	3.2	Reviewed pretrial action plan, updated action items (.7). Call with John Powers RE pretrial action items (.5). Reviewed sample FOFs, Stipulations (1) Reviewed Lovulo deposition transcript, designations (1).
Rosenberg	9/11/2019	0.6	0	receipt and respond to emails to and from N Steiner and J Powers re trial preparation issues; confer with N Steiner re allocation of responsibility at trial
Powers	9/11/2019	6.1	6.1	Review joint motion for extension of filing pretrial documents (0.3); exchange of emails with N. Steiner and E. Rosenberg re: trial preparation issues (0.4); exchange more emails with T. Grayson and M. Meredith regarding documents they relied on, review documents that they provided by Dropbox link, and exchange emails with N. Steiner and co-counsel re: same (0.7); exchange emails with co-counsel regarding which witnesses we should prepare deposition designations for (0.2); prepare draft of deposition summaries with page/line citations to transcript for Denise Roberts and Robert Holman, review Roberts and Holman deposition designations and make changes, and circulate with co-counsel by email (2.4); exchange emails with Jim Cooney and opposing counsel regarding NY AG document production and redaction-related issues and internal emails with co-counsel re: thereto (0.4); conversation with S. Lerner to discuss attending Michael Ryan's deposition and availability to work on declaration (0.3); exchange emails with N. Steiner regarding the possibility of having a conversation and then summarizing conversation with S. Lerner (0.4); exchange emails with R. Snow and A. Davis regarding joint stipulation of agreed-upon facts (0.3); work on draft summaries of Connolly's and Valentine's depositions (0.7)
Snow	9/12/2019	5.5	5.5	Reviewed Valentine deposition designations (1.5). Drafted FOFs/Stipulations for Valentine (4).

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Powers	9/12/2019	8.5	8.5	Continue working on draft summaries of depositions of Connolly and Valentine (0.4), continue work on identifying helpful Connolly and Valentine responses to deposition questions (1.3); revise list of portions of Connolly and Valentine designated testimony and circulate with co-counsel by email (0.7); review two sets of deposition designations for Holman Roberts Connolly and Valentine, identify portions that were changed, and send list of changes to T. Lewis (0.9); call with NY AG and opposing counsel regarding production of NY AG docs and redaction of PII and exchange separate emails with opposing counsel and co-counsel re: thereto (0.6); write summary of conversation and send to co-counsel by email (0.3); conversation with R. Snow regarding NY AG docs that we should consider producing and email to all co-counsel re: thereto (0.3); research and initial work on drafting pre-trial FOF/COL, focusing on creating framework/outline and FOF re: the standing of CCNY (3.8); circulate portion of draft FOF/COL re: CCNY's standing with co-counsel (0.2)
Snow	9/13/2019	4.7	4.7	Reviewed John Powers' notes RE partial draft of Valentine FOFs/Stipulations (.5). Met with Alex Davis to discuss pretrial action items (.5). Reviewed Draft FOFs (.5). Drafted FOFs/Stipulations for Valentine (3.2)
Powers	9/13/2019	14.7	10.9	Attend and participate in the deposition of Michael Ryan (5.8); Travel from NYC to Washington DC by train (3.8 - NC); type of note from Ryan deposition and send a summary of the deposition to co-counsel (0.7); exchange additional emails with N. Steiner and S. Lerner re: Ryan deposition (0.2); work on drafting pre-trial FOF/COL, focusing on FOFs re: burden (4.2)
Powers	9/14/2019	7.1	7.1	Drafting pre-trial FOF/COL, focusing on FOFs re: burden using Meredith's report (7.1)
Powers	9/15/2019	9.1	9.1	Drafting pre-trial FOF/COL, focusing on FOFs re: burden using Meredith's report (9.1)
Snow	9/16/2019	3.4	3.4	Reviewed NYSBOE employee deposition designations, pulled Stipulations and Findings of Fact (3.4)
Powers	9/16/2019	6.8	6.8	Drafting pre-trial FOF/COL, focusing on FOFs re: burden using Meredith's report (6.6); exchange emails with S. Lerner and opposing counsel re: errata for Lerner and Goff (0.2);
Snow	9/17/2019	3.8	3.8	FOFs/Stipulations from Ryan depo (3.8)
Powers	9/17/2019	9.3	9.3	Drafting pre-trial FOF/COL, focusing on FOFs re: state interest using Grayson's report and reorganizing the framework for the document (9.3);
Snow	9/18/2019	5.2	5.2	Met with John Powers to discuss pretrial report tasks (.3). NYS Inactive - FOFs/Stipulations from Ryan depo (4.9)
Powers	9/18/2019	9.5	9.5	Drafting pre-trial FOF/COL, focusing on FOFs by adding citations to V. Martin's dec., Ds' answer to complaint, Court's order on MTD, and relevant NY states, also started working on NVRA section of COL (8.1); review transcript of Michael Ryan deposition (0.8); exchange emails with A. Davis, R. Snow, co-counsel re: thereto (0.2); review spreadsheet containing individual voter complaints from the NY AG's office and insert specific examples into the FOF/COL and email team re: thereto (0.4);
Snow	9/19/2019	8.7	8.7	Met with John Powers to discuss FOFs (.3). Reviewed draft of FOFs (.8). Call with co-counsel to discuss remaining pretrial action items (1.3). Reviewed list of voter witnesses, emailed Susan Lerner RE CCNY membership list search (1). Reviewed list of potential NYAG doc evidence, flagged relevant docs (5.3).

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Powers	9/19/2019	9.8	9.8	Drafting pre-trial FOF/COL, adding details on CCNY's standing, citations to M. Ryan's dep transcript, and drafted COL for burden on the fundamental right to vote claim (6.2); conversation with E. Rosenberg and N. Steiner (0.3); exchange emails re: declarations of A. Dittus and R. Mohr with co-counsel and with opposing counsel; exchange emails with T. Grayson and M. Meredith re: Ryan deposition transcript and Martin declaration, Nassau County documents, exchange emails with co-counsel re: NY AG docs (0.6); review Dittus and Mohr declarations and exchange emails with co-counsel re: thereto (0.4); review witness list and exchange emails with N. Steiner re: witness assignments (0.4); conversation with M. Meredith re: preparation for trial (0.4); exchange emails with K. Shorey and other re: producing training materials docs and agreeing to list of stipulated exhibits (0.3); prepare list of voter witnesses for trial with a summary of testimony (1.1); exchanged emails with Sarah Goff and opposing counsel re: Goff's errata (0.2);
Snow	9/20/2019	6.5	6.5	Reviewed list of potential NYAG doc evidence, flagged relevant docs (5.5); Met with John Powers to discuss FOF/COL (.7); Called and emailed Gregory Montas RE declaration (.3).
Rosenberg	9/20/2019	1.5	0	Review and comment on draft FOF/COL
Powers	9/20/2019	6.5	6.5	Drafting pre-trial FOF/COL, focusing on finalizing NVRA COL section, added citations to voter declarations (5.4); exchange emails with K. Shorey re: exhibits (Roberts Facebook photos and Ulster County docs) (0.2); draft document placing voter testimony into "buckets" based on the nature of their experiences (0.5); revise summaries accompanying list of voter witnesses with citations to declarations (0.4)
Snow	9/21/2019	4.1	4.1	Edited FOF/COL to add voter complaint exhibits for voters denied affidavit ballots (3.6). Call with John Powers RE CCNY standing issue, FOF/COL (.5)
Powers	9/21/2019	9.4	9.4	Complete rough draft of pre-trial FOF/COL, add cites M. Ryan depo and SBOE testimony, review thoroughly, make edits to both FOFs and COLs (8.8); exchange emails and phone calls with R. Snow, S. Lerner re: whether Denise Roberts is a member of Common Cause and issues related to CCNY and associational standing (0.6); email co-counsel and E. Rosenberg/J. Greenbaum summarizing work done on the FOF/COL and areas to focus on
Powers	9/22/2019	0.5	0.5	Exchange emails with N. Steiner re: next steps on FOF/COL and potential inserts (0.3); exchange emails with H. Bonaccosi re: summary of Connolly's deposition (0.2)
Snow	9/23/2019	7.5	7.5	Generated FOFs/Stipulations from Ryan depo (6). Met with John Powers to discuss FOFs (.5). Call with co-counsel to discuss Defs. exhibits (1)
Powers	9/23/2019	10.3	10.3	Continue, editing, revising, drafting pre-trial FOF/COL in light of feedback received from N. Steiner (8.8) reviewed and provided feedback on draft of the joint pretrial report (0.7); exchange emails with M. Meredith and opposing counsel re: Meredith's errata, and review errata (0.3); exchange emails re: draft FOF/COL with N. Steiner (0.2); exchange emails with N. Steiner re: witnesses to call and witness order (0.3)
Snow	9/24/2019	6.6	6.2	Collected Defs. Declarations and Exhibits, saved to shared drive (.9). Edited FOFs (4.3). Call with Defs. counsel RE Joint Pretrial Report (.5). Call with co-counsel RE Joint Pretrial Report (.5). Booked travel to NYC (.4 - NC).

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Powers	9/24/2019	9.9	9.9	Revise, edit, and continue drafting pre-trial FOF/COL to implement N. Steiner's recommendations and suggestions and respond to his comments, review deposition transcripts for citations (6.9); exchange emails with N. Steiner and H. Bonaccorsi re: making specific changes to the FOF (0.3); review FOF/COL to identify "new" exhibits, locate the PDFs of exhibits, and send them to A. Do and Dechert team so they can supplement a list (0.4); review S. Lerner's declaration and exchange emails with N. Steiner re: Susan's affidavit (0.5); exchange emails with R. Snow re: Ds' declarations and exhibits (0.2); exchange multiple emails with E. Rosenberg and N. Steiner re: calling Valentine and relevant admissions, calling other witnesses, and witness assignments (0.5); exchange emails with J. Conarck re: cite check of FOF/COL (0.2); exchange emails and conversation with M. Meredith regarding FOF/COL, his reports, and changes to his calculations and trial testimony (0.5); review Connolly, Valentine, and Brehm declarations (0.4)
Snow	9/25/2019	9.4	9.4	Reviewed Plaintiffs Exhibit list, Defs. objections (.8). Edited FOF to add additional citations, parentheticals (6.5). Emails with co-counsel RE pretrial filings (.6). Reviewed FOF (1.5)
Powers	9/25/2019	11.5	11.5	Undertake full final review and provide last round of feedback/changes to P's proposed findings of fact and conclusions of law and circulate feedback with co-counsel by email (2.1); Conduct legal research, draft a portion of, review, edit, assist with the final review of P's pretrial memorandum of law (2.7); begin drafting, complete, edit, review, finalize, exchange emails with N. Steiner regard changes to, phone calls with M. Meredith, obtain signature from M. Meredith, and serve supplemental M. Meredith declaration (2.5); talk with S. Lerner multiple times about her declaration, review, edit, and send draft declaration back to S. Lerner, obtain her signature, complete, and finalize Lerner declaration (3.1); exchange emails with N. Steiner et. al re: late-breaking exhibits and corrections to exhibit list (0.6); provide feedback and assist with final review of joint pretrial report and circulate by
Snow	9/26/2019	1.8	1.5	Reviewed Connolly Declaration and exhibits (1.5). Email to Lorelle Atkinson RE communications strategy (.3 - NC)
Rosenberg	9/26/2019	1	0	Multi-emails to and from J Powers and N Steiner re preparation for trial
Powers	9/26/2019	1.3	1.3	Exchange emails with co-counsel, email Meredith re: need to obtain signature, otherwise assist with the final review of P's notice of filing the signed copy of Dr. Meredith's expert report (0.8); exchange emails with E. Rosenberg and N. Steiner re: preparation for trial (0.5)
Rosenberg	9/27/2019	1	0	Multi-emails to and from N Steiner and J Powers re miscellaneous trial preparation issues
Powers	9/27/2019	3.8	3.8	Exchange emails with J. Conarck re: the legal standard for standing in the Second Circuit and its application to CCNY (0.3); review Ds' pre-trial FOF and trial brief and draft memo identifying main arguments and identifying potential gaps (1.9); exchange emails with N. Steiner and E. Rosenberg re: thereto and the possibility of opening/closing argument and post-trial briefing (0.5); draft brief memo weighing pros and cons of cross-examining Dittus and Mohr and identifying potential topics for cross-examination (0.7); email S. Lerner re: Dittus and Mohr (0.2); email and talk with N. Steiner and E. Rosenberg re: assignments (0.2)
Powers	9/28/2019	1.2	1.2	Review the Brehm, Connolly, and Valentine declarations (0.5); conversation with N. Steiner re: assignments and moving to strike the Brehm, Connolly, and Valentine declarations (0.4); email E. Rosenberg and N. Steiner re: thereto (0.3)

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Powers	9/29/2019	0.7	0.7	Confer with E. Rosenberg re: motion to strike, crossing county election commissioners, and changes to witness assignments, email N. Steiner and E. Rosenberg re: thereto (0.7)
Snow	9/30/2019	0.5	0.5	Met with John Powers to discuss pretrial action items (.5)
Rosenberg	9/30/2019	0.8	0	Confer with J Powers re trial preparation issues; review Connolly and Brehm declarations
Powers	9/30/2019	1.7	1.7	Review, provide feedback, and assist with the final review of P's notice regarding cross-examination of trial witnesses, and exchange lengthy emails about crossing Mohr and Dittus (1.5); exchange emails with R. Snow re: Montas declaration (0.2);
Snow	10/1/2019	0.9	0.5	Call with Stephanie Goldberg to discuss trial; met with John Powers to discuss same (.5). Emails with Communications team to discuss trial (.4 - NC).
Powers	10/1/2019	1.8	1.8	Review Defendants' list of witnesses to cross examine and email co-counsel re: reactions thereto and strategy (0.6); conversation with V. Martin re: need for her to appear at trial and making logistical arrangements related to her testimony and follow-up by email (0.5); exchange emails with co-counsel re: making arrangements for V. Martin (0.2); contact T. Grayson and M. Meredith re: trial logistics (0.5)
Snow	10/2/2019	2.6	2.6	Reviewed Draft Motion to Strike (.7). Researched exclusion of expert and lay expert witness testimony, testimony concerning legislative intent; emailed citations to John Powers (1.9).
Powers	10/2/2019	3.5	3.5	Two rounds of review of brief in support of P's motion to strike the declarations of Brehm, Connolly, and Valentine, conducted legal research and added cites to past voting rights cases to see if Brehm testimony is actually expert testimony, and exchange emails with E. Rosenberg, A. Do, N. Steiner re: thereto (3.2); exchange emails with opposing counsel and N. Steiner re: setting up a call for the next day to discuss logistics for trial and the pre-trial conference (0.3)
Snow	10/3/2019	0.5	0.5	NYS Inactive - Call with Defs. counsel RE pretrial conference (.5)
Powers	10/3/2019	0.7	0.7	Call with opposing counsel and N. Steiner re: setting up a call for the next day to discuss logistics for trial and the pre-trial conference and other prep
Powers	10/4/2019	2.7	2.7	Review T. Valentine declaration and begin drafting outline for Valentine cross examination (1.0); exchange multiple emails with co-counsel regarding attending pre-trial conference and make the necessary arrangements (0.3); review Ds' brief in opposition to P's motion to strike, write up a memo providing feedback, research Valentine's dec to find portions we can cite to as problematic in the reply brief, and circulate reactions/suggestions to co-counsel (1.1); exchange emails with M. Meredith regarding trial and trial prep (0.3);
Rosenberg	10/6/2019	0.5	0	Multi-emails to and from trial team in preparation for pretrial conference
Powers	10/6/2019	14.8	10.9	Travel from Washington DC to NYC by train (3.9 - NC); conversation with M. Meredith to practice re-direct (1.1); work on M. Meredith re-direct (0.5); exchange emails with N. Steiner and E. Rosenberg re: witness order, strategy and assignments for the pre-trial conference (0.3); conduct legal research and prepare outline of arguments for pretrial conference for arguing admissibility of voter complaints, declaration of deceased voter, NY amicus brief, election data, and our other exhibits, and email N. Steiner and E. Rosenberg re: thereto (8.4); create spreadsheet listing all P's exhibits to which Ds object, the basis for their objection, and our anticipated response (1.1)
Snow	10/7/2019	0.5	0.5	NYS Inactive - call with John Powers to discuss trial prep (.5)

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Rosenberg	10/7/2019	1	0	Confer with J Powers re pretrial issues; emails to and from N Steiner re thereto; participate in call with trial team in preparation for trial
Powers	10/7/2019	13.5	8.6	Review P's exhibits, applicable case law, and continue refining potential arguments re: Ds' objections to our exhibits (2); attend and participate in the final pretrial conference, meet with co-counsel beforehand and afterwards and discuss trial strategy, witnesses, follow up from hearing (3.8); draft lengthy summary of the pre-trial conference and circulate with E. Rosenberg and N. Steiner (0.5); exchange emails with A. Do, T. Jayaraman, and other co-counsel re: NY AG and Nassau County redacted documents (0.3); email and call Jim Cooney from the NY AG's office re: completeness objections and unredacted docs from NY AG production and follow up with team re: thereto (0.6); exchange emails with co-counsel re: marking exhibits (0.3); exchange emails with opposing counsel re: setting up a call for tomorrow to discuss exhibits and other items (0.2); conversation with V. Martin re: case and testimony (0.5); exchange emails with co-counsel re: outstanding research items re: Ds' objection to our exhibits (e.g., business record exception and present sense impression) (0.4); travel from courthouse in NYC to Washington DC by Lyft ride and train (4.6 - NC); emails to/from B. Stern and L. Atkinson re: trial strategy (0.3 - NC);
Snow	10/8/2019	3.7	3	NYS Inactive - Call with Lorelle Atkinson and comms team RE comms strategy (.7 - NC). Researched unavailability exception to Rule Against Hearsay (2). Edited response to Defs. hearsay objection to Declaration of James W. Johnson, Jr. (1).
Rosenberg	10/8/2019	2	0	Participate in multi-conference calls with trial team in preparation for trial; review and comment on draft submissions; multi conferences with J Powers in prep for trial
Powers	10/8/2019	12.2	12.2	Call with opposing counsel to confer regarding exhibits and other follow up items from the pre-trial conference, preparation for call, and follow-up with co-counsel afterwards, including internal co-counsel call following the call with Ds' counsel to discuss pre-trial issues such as whether to cross certain witnesses, depo videos, and tomorrow's filing (3.1); exchange emails with co-counsel re: witness order, need to call Lovullo, individual P's exhibits, withdrawing certain of P's exhibits due to objections from Ds, providing unredacted copies of exhibits to the Court under weal (1.9); prepare list of exhibits to which Ds' had previously objected, and confirming which were withdrawn and which were not (0.6); email to Ds circulating this list of objected-to exhibits (0.3); email Jim Cooney re: status of exhibits (0.3); drafted, reviewed, edited, and completed substance of draft of portion of letter motion to J. Nathan saying Ds' objections to Ps' exhibits 17, 18, 21, 22, 121, 170, 185, 196, 249, and 253 should be overruled - and conducted attendant legal research (5.8); exchange emails with A. Davis and R. Snow re: thereto (0.2)
Snow	10/9/2019	1.9	1.9	Met with John Powers to discuss redirect of Trey Grayson; called Grayson (.3). Met with John Powers to discuss redirect of Trey Grayson; emailed Grayson (.4). Call with Trey Greyson RE redirect prep (.7). Reviewed Grayson expert report, Defs. declaration s; Emailed Grayson with follow-up from call and docs to review (.5).
Rosenberg	10/9/2019	1	0	Continue review and comment on draft examinations; confer with J Powers re thereto; multi-emails to and from N Steiner re thereto

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Powers	10/9/2019	11.8	11.3	Two rounds of review of Plaintiff's letter motion in response to objections raised by Ds to P's exhibits, and on the complete letter motion (1.0); draft outline of potential questions for Meredith re-direct and send to E. Rosenberg for review (7.1); review Ds' brief in opposition to P's motion to strike, conduct legal research, and send summary of research to co-counsel (1.3); review joint status letter to the Court addressing issues raised during pre-trial conference and provide feedback to co-counsel, and exchange emails and confer with E. Rosenberg re: thereto (0.6); met with R. Snow to discuss redirect of T. Grayson, spoke with Grayson, and exchanged emails re: thereto (1); exchanged emails with co-counsel re: T. Grayson's compensation for testifying at trial (0.3); spoke with WNYC reporter re: trial (0.5 - NC)
Snow	10/10/2019	2	1	Emailed voter-witnesses RE trial details, media/comms (1 - NC). Researched Fundamental Right to Vote claims in Second Circuit; Emails with co-counsel RE same (1).
Rosenberg	10/10/2019	1.5	0	Review and comment on re-drafts of examinations; confer with J Powers re thereto; multi emails to and from Trial Team re trial strategies, witness order, and exhibits.
Powers	10/10/2019	8.2	8.2	Work on drafting outline of Valentine cross examination and prep for cross (4.6); conversation with M. Meredith (0.1); review E. Rosenberg's feedback on the draft outline of the M. Meredith re-direct (0.3); exchange emails with T. Grayson and co-counsel re: T. Grayson compensation for testifying at trial (0.3); exchange emails with co-counsel re: shortening deposition designations (0.2); review N. Steiner's suggested cuts to testimony (e.g., cutting Roberts depo designations and cutting Lovullo), review the relevant depo transcripts, and exchange multiple emails re: whether or not to make certain cuts and related strategy (0.9), review reply in support of motion to strike Brehm/Connolly/Valentine decs and make edits, draft sections inserting references to Valentine declaration, review Connolly declaration paragraphs and make suggestions as to which to add in and suggest other changes (1.1); exchange emails with co-counsel re: response letter regarding the ancient documents issue (0.3), exchange multiple emails with co-counsel re: discussion of Anderson-Burdick in the reply brief in support of the motion to strike (0.4)
Snow	10/11/2019	7.1	6.7	Reviewed and edited draft press release (.4 - NC). Reviewed Declaration of Trey Greyson (1). Reviewed Declarations of Brehm, Valentine, Connolly (.5). Researched public statements of Trey Grayson RE voter registration list maintenance (1). Drafted outline for re-direct examination of Trey Grayson (3.3). Call with Trey Grayson and John Powers RE re-direct examination (.9).
Rosenberg	10/11/2019	1	0	Multi-emails to and from Trial Team re various trial issues, including examinations and exhibits; confer with J Powers re thereto; confer with N Steiner re trial issues
Powers	10/11/2019	11.1	10.0	Review T. Valentine's declaration and continue drafting outline of Valentine cross examination and preparing for cross, incorporating feedback from E. Rosenberg re: thereto and reviewing entire deposition transcript to make sure all topics covered (7.6); locate, review, and prepare potential exhibits for Valentine cross-examination (0.5); review and make edits to draft press release surrounding trial (1.1 - NC); exchange multiple emails with Jim Cooney with the NY AG's office/ co-counsel/ opposing counsel re: exhibit related issues (0.7); exchange multiple emails with co-counsel re: witnesses and trial logistics (0.5); review updated joint status letter to the court and offer feedback (0.3); review and update spreadsheet tracking the status of all of Ds' objections to P's exhibits in light of comms from Ds (0.4)

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Rosenberg	10/12/2019	1.6	0	Review and edit examination of Valentine; emails to and from J Powers re thereto
Powers	10/12/2019	11.3	7.3	Travel from Washington DC to NYC by train (4.0 - NC); continue drafting outline of Valentine cross examination, incorporating feedback from E. Rosenberg re: thereto, and preparing for cross (5.9); conversation with V. Martin about the case, draft notes summarizing the conversation and flagging important facts and topics to ask questions about on re-direct, send email to E. Rosenberg and N. Steiner describing conversation and discussing strategy (1.1); exchange multiple emails with V. Martin and with co-counsel re: V. Martin's travel logistics (0.3)
Snow	10/13/2019	5	4.5	Drafted outline for re-direct examination of Trey Grayson (4). Emails with co-counsel RE trial prep (.5). Emails with voter-witnesses RE trial attendance (.5 - NC).
Rosenberg	10/13/2019	1	0	Multi- emails to and from trial team re trial strategy issues
Powers	10/13/2019	10.2	10.2	Finish drafting, review, finalize outline for cross examination of Valentine (3.4); draft outline of potential re-direct questions to ask V. Martin (2.9); continue drafting, editing, revising, and finalizing first of potential re-direct of M. Meredith (3.5); exchange multiple emails re: trial preparation and logistics with N. Steiner, other co-counsel, and S. Lerner (0.4)
Snow	10/14/2019	10	9	Emails with Comms team RE media strategy (.5 - NC). Practiced mock cross and re-direct examinations with Trey Grayson, John Powers, and Neil Steiner (3). Revised outline for re-direct examination of Trey Grayson (2). Discussed cross and re-direct examinations of other witnesses with co-counsel (1). Emails with voter-witnesses RE trial attendance (.5 - NC). Reviewed Rooberts deposition video excerpts (1). Finalized outline for re-direct examination of Trey Grayson (2).
Rosenberg	10/14/2019	1.5	0	Review and edit re-write of Meredith examination; multi- emails to and from Trial Team re trial strategy issues
Powers	10/14/2019	10.3	10.3	Complete drafting and revise outline of potential re-direct questions to ask V. Martin based on feedback from E. Rosenberg, meet with V. Martin and review re-direct with V. Martin, edit, revise, and finalize re-direct, and practice cross-examination (2.7); continue drafting and revising potential re-direct of M. Meredith based on conversation with M. Meredith and feedback from E. Rosenberg and other co-counsel (2.4); discussion with M. Meredith to practice re-direct (2.1); trial prep and logistics such as printing documents, exhibits, outlines, etc. (1); assist with trial prep of S. Lerner (0.7); work with trial technician re: exhibits and presentation of cross-exam of Valentine and re-directs of Martin and Meredith (0.4); discussions with N. Steiner, T. Jayaraman, A. Do, and other co-counsel re: trial strategy and implementation, such as the procedure for getting witnesses on the stand and their written reports into evidence as direct testimony (0.6); other trial preparation (0.4)
Snow	10/15/2019	11.5	10	Trial (8). Emails with Comms team RE media (1 - NC). Emails with voter-witnesses RE trial attendance (.5 - NC). Discussed cross and re-direct examinations of other witnesses with co-counsel (1). Researched Amicus Brief of NYAG in Husted case for cross-examination of Thomas Connolly, emailed with Anna Do and Neil Steiner RE same (1).
Powers	10/15/2019	13.1	13.1	Prepare for, attend and participate in Day 1 of trial, including re-direct of V. Martin, and other prep for next day (9.4); meet V. Martin and prepare for cross examination and redirect with warm-up (0.5); cross-examination prep with M. Meredith (2.0); final preparations for cross-examination of T. Valentine (1.2)

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Snow	10/16/2019	9.5	8.5	Trial (8). Emails with Comms team RE media (.5 - NC). Emails with voter-witnesses RE trial attendance (.5 - NC). Discussed cross and re-direct examinations of other witnesses with co-counsel (.5).
Rosenberg	10/16/2019	1	0	Multi-emails to and from N Steiner and J Powers re trial issues
Powers	10/16/2019	11.5	11.5	Attend and participate in Day 2 of trial, including finalizing my preparation and cross-examining T. Valentine, and make preparations for Day 3 of trial (9.1); prep for M. Meredith re-direct by reviewing M. Meredith deposition outline and making final changes based on testimony so far, as well as reviewing Meredith exhibits and conferring with trial technician (2); exchange multiple emails and confer with N. Steiner and E. Rosenberg re: possibility of re-instituting NVRA facial claim (0.4)
Snow	10/17/2019	15.2	14	Trial (5.5). Emails with Comms team, call with Lauren Wolfe RE media (.7 - NC). Emails with voter-witnesses RE trial attendance (.5 - NC). Discussed closing arguments with co-counsel (1.5). Drafted list of questions from the judge (.8). Reviewed declarations, FOF; drafted list of voter-witnesses by claim/issues for PowerPoint slides (2). Emails with co-counsel RE closing argument strategy (.7). Drafted proposed closing argument outline (1.5). Reviewed Declaration of Marc Meredith, pulled sections RE purported state interest (1). Reviewed trial transcripts, pulled quotes RE purported state interest and voter cost as demonstrating burden (1).
Powers	10/17/2019	13.1	13.1	Attend and participate in Day 3 of trial, including the re-direct of M. Meredith, and make other preparations for closing argument (7.9); conduct research and draft closing argument related to the legal standard for burden on the fundamental right to vote and as-applied NVRA claims (3.3); assist with preparation of PowerPoint slides to accompany Mr. Steiner's closing argument presentation (1.9)
Snow	10/18/2019	4.8	4.5	Emailed co-counsel RE final points of emphasis for closing argument (.5). Met with voter-witness Stephanie Goldberg, recorded video for Comms (.3 - NC). Trial (2). Debriefed with co-counsel; discussed post-trial memo, timing (1.5). Call with John Powers RE closing argument takeaways, plan for post-trial memo (.5).
Powers	10/18/2019	11.2	6.5	Complete preparation of closing argument (2.9); attend and participate in closing argument (2); confer with counsel after closing argument (0.9); draft summary of oral arguments and suggestions for areas of emphasis in post-trial proceedings and send to E. Rosenberg (0.7); travel from courthouse in NYC to Washington DC by Lyft ride and train (4.7 - NC)
Powers	10/19/2019	0.4	0.4	Draft email to N. Steiner and E. Rosenberg re: trial follow-up and analyzing issues to focus on in post-trial briefing (0.4)
Snow	10/22/2019	0.2	0.2	Call with John Powers RE Post-Trial briefing (.2)
Powers	10/22/2019	0.5	0.5	Exchange emails with co-counsel re: post-trial briefing assignments and 50 state survey work (0.3); conduct research to locate past analyses of other states' list maintenance procedures (0.2)
Snow	10/25/2019	4.7	4.2	Call with John Powers RE Post-Trial briefing (.2). Research on NVRA, systematic denial of ballots to inactive voters (4). Call with Talking Points Memo RE op-ed (.5 - NC)
Powers	10/25/2019	0.8	0.8	Undertake research for, start outline of, and begin working on the post-trial memo of law
Powers	10/26/2019	5.1	5.1	Research case law and draft legal section of the post-trial memo of law, focusing on the right to vote claim and burden on voters
Powers	10/27/2019	4.6	4.6	Drafting the post-trial memo of law - both the legal and facts sections, focusing on the right to vote claim and burden on voters

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Snow	10/28/2019	8.4	8.4	Call with John Powers RE post-trial brief (.2). Reviewed trial transcript; Drafted post-trial brief Introduction (4.1). Reviewed FOF/COL, Pretrial Brief, Defs. Pretrial Brief; Drafted and edited post-trial brief Standing section (4.1).
Powers	10/28/2019	6.9	6.9	Continue working on the post-trial memo of law, focusing on the NVRA claim
Snow	10/29/2019	8.2	8.2	Drafted and edited post-trial brief Standing section (6.2). Drafted and edited post-trial brief NVRA violation section (2).
Powers	10/29/2019	9.2	9.2	Continue working on the post-trial memo of law, focusing on the right to vote claim and the lack of state interest, introduction, and standing
Snow	10/30/2019	7.8	7.8	Drafted and edited post-trial brief NVRA violation section (7.8)
Powers	10/30/2019	7.2	7.2	Continue working on the post-trial memo of law
Snow	10/31/2019	2	2	Drafted and edited post-trial brief NVRA violation section (2)
Rosenberg	10/31/2019	1.4	0	thereto
Powers	10/31/2019	8.6	8.6	Continue working on the post-trial memo of law (7.1); implement edits to brief at suggestion of E. Rosenberg (0.8) exchange emails with E. Rosenberg, N. Steiner, T. Jayaraman re: seeking an extension (0.4); exchange emails with A. Davis and R. Snow re: specific facts and cites to memo of law (0.3),
Snow	11/1/2019	4.2	4.2	Edited 50-State Survey (4.2)
Rosenberg	11/1/2019	1.5	0	Continue review and comments to post-trial brief; review on comment on post-trial Findings of Fact; emails to and from J Greenbaum, N Steiner and J Powers re thereto
Powers	11/1/2019	4.3	4.3	Continue drafting, review, edit, make additions/removals, and complete draft of the post-trial memo of law, implementing Neil's substantive suggestions and making other of my own such as adding Brehm cites, clean up citations to trial testimony and declarations, call T. Jayaraman re: citations and finalizing process
Rosenberg	11/3/2019	2	0	Emails to and from N Steiner and J Powers re post-trial brief; rewrite of Introduction of post-trial brief
Powers	11/3/2019	7.4	7.4	Last review of the post-trial memo of law, finalize document (6.8); exchange multiple emails with T. Jayaraman and N. Steiner regarding changes to and process for finalizing the memo of law (0.6)
Snow	11/4/2019	2	2	Proofread and edited Post-trial FOFs (2)
Rosenberg	11/4/2019	0.8	0	Multi-emails to and from Dechert and LatinoJustice and J Powers re post-trial brief
Powers	11/4/2019	1.3	1.3	Exchange multiple emails and calls with T. Jayaraman re: finalizing the post-trial memo of law (0.7), review post-trial f FOF (0.6)
Powers	11/21/2019	1.1	1.1	Review Ds' post-trial memo of law and proposed FOF/COL
Powers	11/22/2019	7.8	7.8	Outline and begin drafting P's post-trial reply brief focusing on state interest, role of affidavit ballots, and the proper standard for as-applied NVRA claims
Powers	11/23/2019	6.6	6.6	Continue drafting P's post-trial reply brief focusing on the proper legal standard and undermining Ds' case citations, absence of voter fraud in NY, focusing on other states' practices, and reviewing/formatting/ cleaning up existing sections of brief and circulating with co-counsel by email
Powers	11/24/2019	5.4	5.4	Finish the last substantive section of P's post-trial reply brief and circulate with co-counsel, review, edit, and add/delete sections in response to feedback from N. Steiner and E. Rosenberg, finalize, and circulate again with co-counsel (5.4)

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Snow	11/25/2019	5	1.5	Reviewed filings (.5). Drafted TPM op-ed (3 - NC). Proofread PostTrial response brief (1). Emails with co-counsel RE op-ed (.5 - NC).
Powers	11/25/2019	6.7	6.7	Make last found of edits to the reply brief, finalize, and circulate with co-counsel (1.9); review Post-Trial Counterstatement of Facts and draft paragraphs to insert, make substantive edits, circulate revised version with co-counsel (3.9); exchange multiple emails with E. Rosenberg, N. Steiner, and T. Jayaraman re: counterstatement of facts, specific changes to thereto and obtaining approval for changes, and exchange multiple calls with T. Jayaraman (0.9)
Snow	1/10/2020	2	2	Reviewed opinion
Powers	1/10/2020	1.8	1.3	Review opinion; multiple calls with co-counsel re: same (1.3); draft press release (0.5 - NC)
Powers	1/18/2020	0.6	0.6	Call with S. Lerner re: case, decision, appellate issues, next steps
Powers	1/23/2020	1.2	1.2	Read opinion, analyze appellate issues, conference call with S. Lerner, N. Steiner, E. Rosenberg, J. Chin re: thereto and next steps
Rosenberg	1/24/2020	0.7	0	Participate in call with Dechert team and client re fee preparation issues (.3) and re appeal issues (.4)
Powers	1/28/2020	8.2	4.1	Review expenses and hours billed for purposes of LC's fee application (half charge)
Powers	1/28/2020	0.6	0.3	Confer with E. Rosenberg, J. Greenbaum, N. Steiner, J. Chin, R. Snow re: fee application (half
Snow	1/29/2020	3	1.5	Reviewed hours and expenses for fee application; met with John Powers to discuss same (3 - HC)
Snow	1/30/2020	4	2	Reviewed hours and expenses for fee application (4 - HC)
Total		1,698.3	1,461.3	